

Exhibit B

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977
Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738
Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970
Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978
Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279
Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al,
No. 04-CV-1923
World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., No. 04-CV-07280

**DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA'S
RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant World Assembly of Muslim Youth Saudi Arabia ("WAMY Saudi Arabia"), through undersigned counsel, hereby responds to Plaintiffs' Request for Production of Documents.

GENERAL OBJECTIONS

1. Defendant WAMY Saudi Arabia objects to plaintiffs' "Definitions" and Document Requests insofar as they:
 - a. Request information or identification of documents concerning confidential communications between defendant and its attorneys, on the grounds that the information sought is protected under the attorney/client privilege;
 - b. Request information or identification of documents prepared by Defendant's counsel for their own use, or prepared by Defendant or Defendant's witnesses

for use by Defendant's counsel, on the grounds that the information sought is protected from disclosure by the attorney work-product doctrine;

- c. Seek to enlarge Defendant's obligation to respond to discovery beyond the obligations established by the Federal Rules of Civil Procedure and the Local Rules of this Court;
- d. Seek discovery from Defendant of documents that are in the possession, custody or control of another entity other than WAMY Saudi Arabia.
- e. Seek information or documents to which plaintiffs have an equal or greater access than Defendant.
- f. Seek information or documents prior to the year 1992 pursuant to Judge Daniel's Order of December 21, 2007 (Docket No. 2059) limiting discovery relating back to the period beginning in 1992.

2. Defendant has made a diligent and reasonable search and inquiry for the information requested by the requests. Any response contained herein, however, is given with the understanding that WAMY Saudi Arabia and its attorneys are still conducting discovery and investigation in connection with this action. Defendant's responses are therefore without waiver of, or prejudice to, its right to later use additional information not set forth or referred to in this response. In addition, any response contained herein is made with the express reservation of all rights pursuant to the Federal Rules of Civil Procedure and Local Civil Rules of this Court to supplement or amend these responses or to present evidence either discovered subsequent to the date hereof, or the significance of which is later discovered.

3. In its specific responses below, Defendant's statement that responsive documents will be made available for inspection does not mean (a) that any documents exist or (b) that they are in the possession, custody, or control of the Defendant.
4. Defendant is legally separate from any affiliates or branch offices that may also carry the name "WAMY." Defendant is not in custody or control of documents in the possession of any such affiliate or branch office.
5. Any documents produced herein designated as "Confidential" shall be subject to Judge Casey's Order of Protection of October 3, 2006.
6. The above-stated General Objections are hereby incorporated in each of WAMY Saudi Arabia's following responses to specific requests, whether or not expressly repeated in response to a particular request.

DOCUMENT REQUESTS

Request No. 1

Please provide all documents relating to all accounts in United States banking institutions ("U.S. Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY and its representatives had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the United States banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with

sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 2

Please provide all documents relating to all accounts at the Habib Bank in Peshawar, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Habib Bank, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Defendant WAMY Saudi Arabia is not in custody or control of documents associated with WAMY Pakistan. Subject to and without waiving this objection, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 3

Please provide all documents relating to all accounts at the Emirate Bank International in Islamabad, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account No. 1155-701647 and/or any such accounts associated with Alifuddin Turabi. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY, Alifuddin Turabi and the Emirate Bank International, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad and unduly burdensome and erroneously assumes disputed facts and allegations as if established. Defendant WAMY Saudi Arabia is not in custody of document possessed by WAMY Pakistan. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 4

Please provide all documents relating to all accounts at the Al Rajhi Banking and Investment Corp. established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account Nos. 110608010425160 and 279608010024887. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Al Rajhi Banking and Investment Corp., documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 5

Please provide all documents relating to all other accounts in foreign banking institutions ("Foreign Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or

among WAMY and the foreign banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant refers to the response to Document Request No. 4 above.

Request No. 6

Please provide all documents relating to any investigation, inquiry, review, audit or analysis conducted by any United States state or federal governmental entity, agency and/or department, or any United States-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "United States Investigator"), any foreign government or any foreign-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "Foreign Investigator"), or by the Kingdom of Saudi Arabia or any Saudi Arabian-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "KSA Investigator"), which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 7

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which

references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 8

Please provide all documents relating to any investigation, audit, analysis, examination, survey, or review of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above, conducted either by WAMY, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the KSA and/or the Saudi Arabian Monetary Agency ("SAMA").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 9

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs at its offices in Riyadh and/or Jeddah, Saudi Arabia.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 10

Please provide all documents relating to any investigation or inquiries conducted by the Islamic Republic of Pakistan concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, Pakistan's investigation and decision to deport WAMY personnel from that country in or around October 2001.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Defendant is not in control or custody of documents in the possession of WAMY Pakistan. Subject to and without waiving any objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 11

Please provide all documents relating to the 2002 raid on WAMY's Pakistan office, conducted by authorities of the Islamic Republic of Pakistan, including without limitation, copies of all documents and things which were seized by Pakistani authorities between September 11, 2001 and the present.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. In addition, responsive documents may be subject to attorney-client or work product privilege. WAMY Saudi Arabia is not in custody or control of documents in the possession of WAMY Pakistan.

Request No. 12

Please provide all documents relating to the 2002 detainment of a WAMY employee by authorities of the Islamic Republic of Pakistan for delivering a tape-recorded message from Osama Bin Laden to an Arab television network.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts as if they have already been established. The individual referenced in this request was not an employee of WAMY Saudi Arabia at the time of the conduct alleged. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 13

Please provide all documents relating to any investigation or inquiries conducted by the Republic of India concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing or otherwise supporting Islamic terror groups in the Kashmir region such as Students Islamic Movement of India ("SIMI"), Lashkar-e-Taibah, and Hizbul Mujahideen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, such as WAMY Saudi Arabia "supporting Islamic terror groups in the Kashmir region" and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 14

Please provide all documents relating to the 2002 arrests of two men attempting to transfer money, given to them by WAMY official Nazir Qureshi, to Kashmiri terrorist groups.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Nazir Qureshi was never a WAMY Saudi Arabia official. The cited groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 15

Please provide all documents relating to any investigation or inquiries conducted by Romanian authorities concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, the alleged involvement of WAMY in an al Qaida plot to hijack a plane and crash it into London's Heathrow Airport.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. WAMY Saudi Arabia has no knowledge of this alleged plot. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 16

Please provide all documents relating to any investigation or inquiries conducted by the Russian Federation concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing and otherwise supporting Islamic terrorists and separatists in Chechnya.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 17

Please provide all documents relating to any investigation or inquiries conducted by the Republic of the Philippines concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, accusations by the Philippines Government that WAMY was financing the Moro Islamic Liberation Front ("MILF") terrorist organization.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts and allegations as if established such as WAMY Saudi Arabia's "support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities." Defendant objects to Plaintiffs' request that it does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Defendant is not in control or custody of documents in the possession of WAMY Philippines. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 18

Please provide all documents relating to any investigation or inquiries conducted by the Federal Republic of Germany concerning Ibrahim El Zayat (formerly the Western European Head of WAMY), including without limitation, any investigation regarding the transfer of money by El Zayat and Ayman Sayed Ahmed Aly on behalf of WAMY to the Albanian branch of Taibah International, an Islamic charity whose Bosnian branch was designated as a Specially Designated Global Terrorist Entity in 2004 by the United States and United Nations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is irrelevant, overbroad, unduly burdensome and erroneously assumes disputed facts and allegations as if established, such as WAMY Saudi Arabia transferring money to branch of Taibah International. The request does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 19

Please provide all documents relating to the 2002 raid of WAMY's offices in Virginia, conducted by U.S. authorities, including without limitation, copies of all documents and things which were seized by U.S. authorities between September 11, 2001 and the present.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant further objects on the ground that WAMY Saudi Arabia is not in custody or control of documents related to WAMY International.

Request No. 20

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 21

Please provide all documents WAMY sent to, and/or received from the person and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), including without limitation, all documents relating to the transfer of funds between WAMY and those persons and entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing

Request No. 22

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant,

erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 23

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons identified in Attachment B. For those persons who currently hold, or have held, positions within WAMY, responsive documents shall include, but are not limited to, their personnel files.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents related to individuals employed by other WAMY chapters including WAMY International. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 24

Please provide all documents WAMY sent to, and/or received from the persons identified in Attachment B, including without limitation, all documents relating to the transfer of funds between WAMY and those persons.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents related to individuals employed by other WAMY chapters including WAMY International. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 25

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons identified in Attachment B, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents related to individuals employed by other WAMY chapters including WAMY International. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 26

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the entities identified in Attachment C.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 27

Please provide all documents WAMY sent to, and/or received from the entities identified in Attachment C, including without limitation, all documents relating to the transfer of funds between WAMY and those entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 28

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the entities identified in Attachment C, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 29

Please provide all documents relating to any investigation or inquiry conducted by any United States Investigator, Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs at its offices in Riyadh and/or Jeddah Saudi Arabia.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 30

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 31

Please provide all documents relating to any internal investigation or inquiry conducted by WAMY and/or WAMY Personnel which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include any investigation or inquiry ordered, conducted, supervised, overseen, or reviewed by the KSA and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 32

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek

discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 33

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 34

Please provide all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or associated with WAMY, was associated with or involved in any military or terrorist activity, plot or attack, indicating an intention to direct conduct against or target conduct toward the United States of America.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "military activity, plot or attack." Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 35

Please provide any and all documents relating to any sanctions imposed upon WAMY and/or WAMY Personnel by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 36

Please provide all documents relating to the struggle against the Soviet occupation of Afghanistan during the 1980s, including without limitation, WAMY's involvement.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 37

Please provide all documents relating to WAMY's role in providing material support or resources, directly or indirectly, to the mujihadeen forces in Afghanistan in their struggle against the Soviet occupation during the 1980s. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 38

Please provide all documents relating to WAMY's role in providing material support or resources to the mujihadeen forces or other Islamic fighters in Afghanistan, Albania, Algeria, Bosnia, Chechnya, Egypt, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Somalia, Sudan, Tanzania, Turkey, Yemen, or elsewhere, including without limitation, the support of camps in and/or around those areas, recruitment, training, transportation, lodging, the acquisition, trafficking, and/or smuggling of weapons and arms such as rockets, mortars, rifles, dynamite and other bombs, and the provision of boots, tents, and uniforms.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." The conflicts, crises or conditions referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 39

Please provide all documents authored, published, or disseminated by WAMY relating to the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several "conflicts, crises or conditions" referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 40

Please provide all documents relating to fundraising activities conducted by WAMY in relation to relief or humanitarian efforts, or other operations, in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 41

Please provide all interviews, statements, or speeches by WAMY Personnel regarding the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several “conflicts, crises or conditions” referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 42

Please provide all documents authored, published, or disseminated by WAMY discussing the legitimacy of any armed jihad or resistance by Muslims in Afghanistan, Albania, Algeria,

Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant insofar as many of the named conflicts, crises and conditions have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 43

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to mujahideen forces in any part of the World. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome and erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of "mujahideen forces." Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 44

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to any armed jihad in any part of the World, regardless of whether such jihad was declared legitimate by competent religious authorities. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of “financial, medical, logistical, administrative, religious and political assistance.” Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 45

Please provide all interviews, statements, or speeches by WAMY Personnel which mention "jihad" (*see* Definition No. 18), regardless of whether you believe such individual(s) was or was not acting within the scope of his employment at WAMY in relation to such activity.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs’ overbroad definition of *jihad*. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 46

Please provide all documents authored, published, or disseminated by WAMY which mention "jihad" (*see* Definition No. 18), including without limitation: *Islamic Views; Islamic Camps: Objectives, Program Outlines, Preparatory Steps; Military Lessons in the Jihad Against the Tyrants; A Handy Encyclopedia Of Contemporary Religions & Sects; and Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established such as the publication of *Military Lessons in the Jihad Against the Tyrants*. Defendant objects to Plaintiffs’ overbroad definition of *jihad*. With respect to the listed books, Plaintiffs are already in possession of them. Subject

to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 47

Please provide all WAMY documents mentioning "jihad" (*see* Definition No. 18), which can be generated via an electronic search of WAMY's computers or electronic data storage systems.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs' overbroad definition of *jihad*.

Request No. 48

Please provide a list of all publications, newspapers, newsletters, books, reports, pamphlets, videotapes, audiotapes, and/or websites published, authored, and/or financed in whole or in part, by the WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 49

Please provide all documents illustrating, describing or otherwise relating to WAMY's formation and organizational structure, the date of incorporation, the state of incorporation, the duration of WAMY's existence, any documents relating to WAMY's initial capitalization and subsequent funding, and/or any other writing relating to the creation or purpose of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 50

Please provide all documents relating to the administration, governance, and longterm strategic decision-making of WAMY (including any subsidiary, affiliate, or branch office), including without limitation, articles of incorporation, by-laws, corporate charters, mission statements, constitutions, documents relating to the duties and powers of any boards and/or committees, statements of purpose, and/or any other related writing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity to WAMY Saudi Arabia. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 51

Please provide all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of WAMY, including without limitation, the Kashmir Muslim Youth Committee and the Camps and Conference Committee.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously

assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 52

Please provide all documents identifying each officer, director, trustee, board member, and/or committee member of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 53

Please provide all documents relating to any meetings of officers, directors, trustees, managers, boards, committees, and/or internal bodies of WAMY, including without limitation, any agendas or meeting minutes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 54

Please provide all financial statements, balance sheets, income statements, and annual reports for WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 55

Please provide all documents relating to any audit, analysis, examination, survey, or review of WAMY's bank accounts, investments, assets, capital, and/or financial affairs, conducted either by employees of WAMY or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 56

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents identifying projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek

discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 57

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents summarizing the funds allocated by WAMY to projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 58

Please provide all documents relating to any fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY. Such documents shall include, but are not limited to, advertisements, promotional materials, invitations to the event, press releases issued in connection with the event, lists of sponsors and attendees, documents identifying the purpose of the fundraiser or conference, materials distributed at the event, written receipts and/or records of the monies collected, written receipts and/or records of how those monies were used and/or distributed, lists of donors, lists of speakers, videos or slides shown at the event, and transcripts, broadcasts, audiotape and/or videotapes of the event.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 59

Please provide all documents relating to the relationship between WAMY's Saudi headquarters and WAMY's branch offices worldwide, including but not limited to the WAMY offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 60

Please provide all documents relating to the role of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in the fundraising efforts of WAMY's offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 61

Please provide all documents relating to the relationships between and among WAMY's branch offices worldwide, including but not limited to the WAMY's offices in the United States,

Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY Saudi Arabia is not in custody or control of documents in the possession of other WAMY branches.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 62

Please provide all directives, instructions, and/or communications sent by any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of any WAMY office worldwide to the WAMY offices in the United States.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 63

Please provide all annual, semi-annual and periodic reports submitted by the WAMY branch offices to WAMY headquarters in Saudi Arabia concerning their finances and operations, including without limitation, annual reports, balance sheets, financial statements, bank account summaries, and audits.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 64

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted and followed by WAMY by which charitable contributions are either made to and/or raised by You, how those contributions are collected and accounted for, how it is determined to which charitable designees financial or other forms of support should be distributed, the means by which financial or other forms of support are subsequently disbursed to charitable designees, and the means to ensure that such distributions are being used for charitable purposes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 65

Please provide all documents relating to the involvement of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in determining how funds collected by WAMY's branch offices outside of Saudi Arabia should be allocated and/or in the distribution of funds collected by the offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 66

Please provide all documents relating to any written or oral communications between WAMY and the KSA and/or SAMA regarding anti-terrorism policies, practices or procedures. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 67

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted by WAMY concerning the acceptance and distribution of monetary donations, which were implemented and used, or are currently being used, to prevent or deter financial crimes such as money laundering or the facilitation of terrorism financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 68

Please provide all documents in relating in any way to WAMY meetings, correspondence, statements, or other communications concerning terrorist financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 69

Please provide all summaries of contributions received and/or disbursements made by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and vague. In addition the request asks the Defendant to prepare a summary for Plaintiffs which is extremely burdensome. The request does not seek discovery with sufficient particularity. Plaintiffs' request is not limited in scope to the subject matter of this litigation.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 70

Please provide all information contained in any database maintained by You, identifying or relating to the sources of funds contributed to WAMY, and/or the destination of funds distributed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 71

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (a/Ida the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 72

Please provide all documents WAMY sent to and/or received from the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (aAda the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 73

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies, or papers.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 74

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in advancing the foreign policy objectives of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 75

Please provide all documents relating to all accounts in any United States, Saudi Arabian, or foreign banking or financial institution You currently hold, or have held, jointly with the KSA, any members of the Saudi royal family, or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You currently hold or have held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 76

Please provide all documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of WAMY, including any subsidiary, affiliate, and/or branch office.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 77

Please provide all documents relating to WAMY's initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 78

Please provide all documents defining, establishing, or relating to WAMY's privileges, obligations, activities, and/or rights under the laws of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and limited to the subject matter of this litigation.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 79

Please provide all documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to WAMY, including but not limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over WAMY's operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 80

Please provide all documents relating to any fundraising events and/or conferences that were held for the benefit of WAMY and were promoted, sponsored, organized, funded, managed, attended, or supervised by the KSA, any member of the Saudi family, and/or any Saudi official acting on behalf of the KSA. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 81

Please provide all documents relating to any meeting between officers or representatives of WAMY and any official or agency of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with

sufficient particularity. The scope of this request is too broad and not limited by subject matter. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 82

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and each of the Charities identified in Attachment D. In the event that WAMY, including any subsidiary, affiliate, and/or branch office shared office space with any of the Charities identified in Attachment D, please provide such documents.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 83

Please provide all documents WAMY sent to, and/or received from the Charities identified in Attachment D, including without limitation, all documents relating to the transfer of funds between WAMY and those Charities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 84

Please provide all documents relating to any joint fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY and any of the Charities identified in Attachment D. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 85

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the Charities identified in Attachment D, and/or any accounts over which WAMY currently holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 86

Please provide all documents relating to all information or notification WAMY received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 87

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 88

Please provide all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague,

erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 89

Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 90

Provide copies of any and all laws, statutes, regulations, ordinances, or royal decrees which would have prohibited any Islamic charity or benevolent association from: (i) engaging in conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) providing material support or resources to al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and harassing. The documents requested are available to Plaintiffs from other public sources.

Request No. 91

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Benevolence International Foundation ("BIF"), including but not limited to, documents relating to shared office space or common employees of WAMY and BIF, including the branch offices of WAMY and BIF.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 92

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's and BIF's joint publication and distribution of the book titled *Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if they have already been established. Subject to and without waiving these objections, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 93

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 94

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 95

Please provide all documents You sent to, and/or received from any third party relating to the alleged involvement of WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek

discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "extremist activity" and "radical." Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 96

Please provide all documents You sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "extremist activity" and "radical." Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 97

Please provide all documents relating to any internal investigations conducted by WAMY and/or WAMY Personnel into any alleged criminal, corrupt, or extremist activities of any individual or entity employed by and/or affiliated with WAMY, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Plaintiffs' request is vague and ambiguous as to the definition of "extremist activity" and "radical." Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 98

Please provide all documents relating to any action taken by WAMY and/or WAMY Personnel to prevent criminal activities, including the sponsorship of terrorists or radicals, by any individual or entity employed by and/or affiliated with WAMY or any of its branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 99

Please provide all documents relating to any action undertaken by WAMY and/or WAMY Personnel to remove or purge radical or corrupt elements or individuals from WAMY's branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 100

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY subsidiary, affiliate, branch office, officer, director, trustee, board member, committee member, manager, agent, employee, volunteer, and/or

representative as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 101

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY supporter, donor, supplier, contributor, facilitator, speakers, foreign government supporters, business supporters, or banks as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 102

Please provide all documents relating to any individual currently detained or incarcerated in Cuba, Afghanistan, or elsewhere in connection with the global war on terrorism, including without limitation, all documents relating to any meetings, interviews, or dialogue WAMY and/or WAMY Personnel have had with individuals held at Guantanamo Bay.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously

assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 103

Please provide all documents relating to any WAMY Personnel who have been arrested, detained, or incarcerated in connection with the global war on terrorism, including without limitation, any and all employment records for such individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 104

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, any and all documents relating to any positions such individuals currently hold, or have held, within WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Insofar as this request refers to the specific entities and individuals defined in Definition 15-16, Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents, if available, for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 105

Please provide any and all documents WAMY sent to, and/or received from any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, all documents relating to the transfer of funds between WAMY and such entities and/or individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Insofar as this request refers to the specific entities and individuals defined in Definition 15-16, Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents, if available, for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 106

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of any Saar Network-Related Entity and/or any Saar Network-Related Individual, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Insofar as this request refers to the specific entities and individuals defined in Definition 15-16, Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents, if available, for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 107

Please provide all documents relating to any formal or informal record keeping and document retention policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 108

Please provide all documents relating to any formal or informal document destruction policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate, including without limitation, descriptions of all documents destroyed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Dated: January 21, 2011

Sincerely,

/s/ Omar T. Mohammedi
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Law Firm of Omar T. Mohammedi, LLC
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*Attorneys for World Assembly of Muslim Youth Saudi
Arabia and World Assembly of Muslim Youth International*

CERTIFICATE OF SERVICE

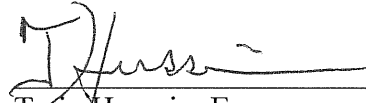
I hereby certify that on the 21st day of January 2011, I caused a copy of Defendants World Assembly of Muslim Youth Saudi Arabia's Responses to Plaintiffs' Requests for Production of Documents to be served by electronic mail upon Plaintiffs' Executive Committee:

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Tariq Hussain, Esq.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977

Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970

Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978

Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279

Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al.,
No. 04-CV-1923

*World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development
Corp., et al.*, No. 04-CV-07280

**DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA'S
SUPPLEMENTAL RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF
DOCUMENTS**

Defendant World Assembly of Muslim Youth Saudi Arabia ("WAMY Saudi Arabia"),
through undersigned counsel, hereby responds to Plaintiffs' Request for Production of
Documents.

GENERAL OBJECTIONS

1. Defendant WAMY Saudi Arabia objects to plaintiffs' "Definitions" and
Document Requests insofar as they:
 - a. Request information or identification of documents concerning confidential
communications between defendant and its attorneys, on the grounds that the
information sought is protected under the attorney/client privilege;
 - b. Request information or identification of documents prepared by Defendant's
counsel for their own use, or prepared by Defendant or Defendant's witnesses

for use by Defendant's counsel, on the grounds that the information sought is protected from disclosure by the attorney work-product doctrine;

- c. Seek to enlarge Defendant's obligation to respond to discovery beyond the obligations established by the Federal Rules of Civil Procedure and the Local Rules of this Court;
- d. Seek discovery from Defendant of documents that are in the possession, custody or control of another entity other than WAMY Saudi Arabia.
- e. Seek information or documents to which plaintiffs have an equal or greater access than Defendant.
- f. Seek information or documents prior to the year 1992 pursuant to Judge Daniel's Order of December 21, 2007 (Docket No. 2059) limiting discovery relating back to the period beginning in 1992.

2. Defendant has made a diligent and reasonable search and inquiry for the information requested by the requests. Any response contained herein, however, is given with the understanding that WAMY Saudi Arabia and its attorneys are still conducting discovery and investigation in connection with this action. Defendant's responses are therefore without waiver of, or prejudice to, its right to later use additional information not set forth or referred to in this response. In addition, any response contained herein is made with the express reservation of all rights pursuant to the Federal Rules of Civil Procedure and Local Civil Rules of this Court to supplement or amend these responses or to present evidence either discovered subsequent to the date hereof, or the significance of which is later discovered.

3. In its specific responses below, Defendant's statement that responsive documents will be made available for inspection does not mean (a) that any documents exist or (b) that they are in the possession, custody, or control of the Defendant.
4. Defendant is legally separate from any affiliates or branch offices that may also carry the name "WAMY." Defendant is not in custody or control of documents in the possession of any such affiliate or branch office.
5. Any documents produced herein designated as "Confidential" shall be subject to Judge Casey's Order of Protection of October 3, 2006.
6. The above-stated General Objections are hereby incorporated in each of WAMY Saudi Arabia's following responses to specific requests, whether or not expressly repeated in response to a particular request.

DOCUMENT REQUESTS

Request No. 1

Please provide all documents relating to all accounts in United States banking institutions ("U.S. Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY and its representatives had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the United States banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with

sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 2

Please provide all documents relating to all accounts at the Habib Bank in Peshawar, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Habib Bank, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Defendant WAMY Saudi Arabia is not in custody or control of documents associated with WAMY Pakistan. Subject to and without waiving this objection, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 3

Please provide all documents relating to all accounts at the Emirate Bank International in Islamabad, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account No. 1155-701647 and/or any such accounts associated with Alifuddin Turabi. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY, Alifuddin Turabi and the Emirate Bank International, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad and unduly burdensome and erroneously assumes disputed facts and allegations as if established. Defendant WAMY Saudi Arabia is not in custody of document possessed by WAMY Pakistan. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 4

Please provide all documents relating to all accounts at the Al Rajhi Banking and Investment Corp. established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account Nos. 110608010425160 and 279608010024887. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Al Rajhi Banking and Investment Corp., documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 5

Please provide all documents relating to all other accounts in foreign banking institutions ("Foreign Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or

among WAMY and the foreign banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant refers to the response to Document Request No. 4 above.

Request No. 6

Please provide all documents relating to any investigation, inquiry, review, audit or analysis conducted by any United States state or federal governmental entity, agency and/or department, or any United States-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "United States Investigator"), any foreign government or any foreign-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "Foreign Investigator"), or by the Kingdom of Saudi Arabia or any Saudi Arabian-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "KSA Investigator"), which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 7

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which

references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 8

Please provide all documents relating to any investigation, audit, analysis, examination, survey, or review of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above, conducted either by WAMY, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the KSA and/or the Saudi Arabian Monetary Agency ("SAMA").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 9

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs at its offices in Riyadh and/or Jeddah, Saudi Arabia.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 10

Please provide all documents relating to any investigation or inquiries conducted by the Islamic Republic of Pakistan concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, Pakistan's investigation and decision to deport WAMY personnel from that country in or around October 2001.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Defendant is not in control or custody of documents in the possession of WAMY Pakistan. Subject to and without waiving any objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 11

Please provide all documents relating to the 2002 raid on WAMY's Pakistan office, conducted by authorities of the Islamic Republic of Pakistan, including without limitation, copies of all documents and things which were seized by Pakistani authorities between September 11, 2001 and the present.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. In addition, responsive documents may be subject to attorney-client or work product privilege. WAMY Saudi Arabia is not in custody or control of documents in the possession of WAMY Pakistan.

Request No. 12

Please provide all documents relating to the 2002 detainment of a WAMY employee by authorities of the Islamic Republic of Pakistan for delivering a tape-recorded message from Osama Bin Laden to an Arab television network.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts as if they have already been established. The individual referenced in this request was not an employee of WAMY Saudi Arabia at the time of the conduct alleged. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 13

Please provide all documents relating to any investigation or inquiries conducted by the Republic of India concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing or otherwise supporting Islamic terror groups in the Kashmir region such as Students Islamic Movement of India ("SIMI"), Lashkar-e-Taibah, and Hizbul Mujahideen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, such as WAMY Saudi Arabia "supporting Islamic terror groups in the Kashmir region" and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 14

Please provide all documents relating to the 2002 arrests of two men attempting to transfer money, given to them by WAMY official Nazir Qureshi, to Kashmiri terrorist groups.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Nazir Qureshi was never a WAMY Saudi Arabia official. The cited groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 15

Please provide all documents relating to any investigation or inquiries conducted by Romanian authorities concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, the alleged involvement of WAMY in an al Qaida plot to hijack a plane and crash it into London's Heathrow Airport.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. WAMY Saudi Arabia has no knowledge of this alleged plot. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 16

Please provide all documents relating to any investigation or inquiries conducted by the Russian Federation concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing and otherwise supporting Islamic terrorists and separatists in Chechnya.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 17

Please provide all documents relating to any investigation or inquiries conducted by the Republic of the Philippines concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, accusations by the Philippines Government that WAMY was financing the Moro Islamic Liberation Front ("MILF") terrorist organization.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts and allegations as if established such as WAMY Saudi Arabia's "support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities." Defendant objects to Plaintiffs' request that it does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Defendant is not in control or custody of documents in the possession of WAMY Philippines. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 18

Please provide all documents relating to any investigation or inquiries conducted by the Federal Republic of Germany concerning Ibrahim El Zayat (formerly the Western European Head of WAMY), including without limitation, any investigation regarding the transfer of money by El Zayat and Ayman Sayed Ahmed Aly on behalf of WAMY to the Albanian branch of Taibah International, an Islamic charity whose Bosnian branch was designated as a Specially Designated Global Terrorist Entity in 2004 by the United States and United Nations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is irrelevant, overbroad, unduly burdensome and erroneously assumes disputed facts and allegations as if established, such as WAMY Saudi Arabia transferring money to branch of Taibah International. The request does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 19

Please provide all documents relating to the 2002 raid of WAMY's offices in Virginia, conducted by U.S. authorities, including without limitation, copies of all documents and things which were seized by U.S. authorities between September 11, 2001 and the present.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant further objects on the ground that WAMY Saudi Arabia is not in custody or control of documents related to WAMY International.

Request No. 20

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 21

Please provide all documents WAMY sent to, and/or received from the person and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), including without limitation, all documents relating to the transfer of funds between WAMY and those persons and entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing

Request No. 22

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant,

erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 23

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons identified in Attachment B. For those persons who currently hold, or have held, positions within WAMY, responsive documents shall include, but are not limited to, their personnel files.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents related to individuals employed by other WAMY chapters including WAMY International. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 24

Please provide all documents WAMY sent to, and/or received from the persons identified in Attachment B, including without limitation, all documents relating to the transfer of funds between WAMY and those persons.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents related to individuals employed by other WAMY chapters including WAMY International. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 25

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons identified in Attachment B, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents related to individuals employed by other WAMY chapters including WAMY International. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 26

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the entities identified in Attachment C.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 27

Please provide all documents WAMY sent to, and/or received from the entities identified in Attachment C, including without limitation, all documents relating to the transfer of funds between WAMY and those entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 28

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the entities identified in Attachment C, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 29

Please provide all documents relating to any investigation or inquiry conducted by any United States Investigator, Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs at its offices in Riyadh and/or Jeddah Saudi Arabia.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 30

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 31

Please provide all documents relating to any internal investigation or inquiry conducted by WAMY and/or WAMY Personnel which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include any investigation or inquiry ordered, conducted, supervised, overseen, or reviewed by the KSA and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 32

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek

discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 33

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 34

Please provide all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or associated with WAMY, was associated with or involved in any military or terrorist activity, plot or attack, indicating an intention to direct conduct against or target conduct toward the United States of America.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "military activity, plot or attack." Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 35

Please provide any and all documents relating to any sanctions imposed upon WAMY and/or WAMY Personnel by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 36

Please provide all documents relating to the struggle against the Soviet occupation of Afghanistan during the 1980s, including without limitation, WAMY's involvement.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 37

Please provide all documents relating to WAMY's role in providing material support or resources, directly or indirectly, to the mujihadeen forces in Afghanistan in their struggle against the Soviet occupation during the 1980s. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 38

Please provide all documents relating to WAMY's role in providing material support or resources to the mujihadeen forces or other Islamic fighters in Afghanistan, Albania, Algeria, Bosnia, Chechnya, Egypt, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Somalia, Sudan, Tanzania, Turkey, Yemen, or elsewhere, including without limitation, the support of camps in and/or around those areas, recruitment, training, transportation, lodging, the acquisition, trafficking, and/or smuggling of weapons and arms such as rockets, mortars, rifles, dynamite and other bombs, and the provision of boots, tents, and uniforms.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." The conflicts, crises or conditions referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 39

Please provide all documents authored, published, or disseminated by WAMY relating to the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several "conflicts, crises or conditions" referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 40

Please provide all documents relating to fundraising activities conducted by WAMY in relation to relief or humanitarian efforts, or other operations, in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 41

Please provide all interviews, statements, or speeches by WAMY Personnel regarding the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several “conflicts, crises or conditions” referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 42

Please provide all documents authored, published, or disseminated by WAMY discussing the legitimacy of any armed jihad or resistance by Muslims in Afghanistan, Albania, Algeria,

Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant insofar as many of the named conflicts, crises and conditions have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 43

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to mujahideen forces in any part of the World. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome and erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of "mujahideen forces." Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 44

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to any armed jihad in any part of the World, regardless of whether such jihad was declared legitimate by competent religious authorities. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of “financial, medical, logistical, administrative, religious and political assistance.” Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 45

Please provide all interviews, statements, or speeches by WAMY Personnel which mention "jihad" (*see* Definition No. 18), regardless of whether you believe such individual(s) was or was not acting within the scope of his employment at WAMY in relation to such activity.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs’ overbroad definition of *jihad*. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 46

Please provide all documents authored, published, or disseminated by WAMY which mention "jihad" (*see* Definition No. 18), including without limitation: *Islamic Views; Islamic Camps: Objectives, Program Outlines, Preparatory Steps; Military Lessons in the Jihad Against the Tyrants; A Handy Encyclopedia Of Contemporary Religions & Sects; and Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established such as the publication of *Military Lessons in the Jihad Against the Tyrants*. Defendant objects to Plaintiffs’ overbroad definition of *jihad*. With respect to the listed books, Plaintiffs are already in possession of them. Subject

to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 47

Please provide all WAMY documents mentioning "jihad" (*see* Definition No. 18), which can be generated via an electronic search of WAMY's computers or electronic data storage systems.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs' overbroad definition of *jihad*.

Request No. 48

Please provide a list of all publications, newspapers, newsletters, books, reports, pamphlets, videotapes, audiotapes, and/or websites published, authored, and/or financed in whole or in part, by the WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 49

Please provide all documents illustrating, describing or otherwise relating to WAMY's formation and organizational structure, the date of incorporation, the state of incorporation, the duration of WAMY's existence, any documents relating to WAMY's initial capitalization and subsequent funding, and/or any other writing relating to the creation or purpose of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 50

Please provide all documents relating to the administration, governance, and longterm strategic decision-making of WAMY (including any subsidiary, affiliate, or branch office), including without limitation, articles of incorporation, by-laws, corporate charters, mission statements, constitutions, documents relating to the duties and powers of any boards and/or committees, statements of purpose, and/or any other related writing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity to WAMY Saudi Arabia. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 51

Please provide all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of WAMY, including without limitation, the Kashmir Muslim Youth Committee and the Camps and Conference Committee.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously

assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 52

Please provide all documents identifying each officer, director, trustee, board member, and/or committee member of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 53

Please provide all documents relating to any meetings of officers, directors, trustees, managers, boards, committees, and/or internal bodies of WAMY, including without limitation, any agendas or meeting minutes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 54

Please provide all financial statements, balance sheets, income statements, and annual reports for WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 55

Please provide all documents relating to any audit, analysis, examination, survey, or review of WAMY's bank accounts, investments, assets, capital, and/or financial affairs, conducted either by employees of WAMY or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 56

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents identifying projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek

discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 57

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents summarizing the funds allocated by WAMY to projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 58

Please provide all documents relating to any fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY. Such documents shall include, but are not limited to, advertisements, promotional materials, invitations to the event, press releases issued in connection with the event, lists of sponsors and attendees, documents identifying the purpose of the fundraiser or conference, materials distributed at the event, written receipts and/or records of the monies collected, written receipts and/or records of how those monies were used and/or distributed, lists of donors, lists of speakers, videos or slides shown at the event, and transcripts, broadcasts, audiotape and/or videotapes of the event.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 59

Please provide all documents relating to the relationship between WAMY's Saudi headquarters and WAMY's branch offices worldwide, including but not limited to the WAMY offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 60

Please provide all documents relating to the role of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in the fundraising efforts of WAMY's offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 61

Please provide all documents relating to the relationships between and among WAMY's branch offices worldwide, including but not limited to the WAMY's offices in the United States,

Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY Saudi Arabia is not in custody or control of documents in the possession of other WAMY branches.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 62

Please provide all directives, instructions, and/or communications sent by any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of any WAMY office worldwide to the WAMY offices in the United States.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 63

Please provide all annual, semi-annual and periodic reports submitted by the WAMY branch offices to WAMY headquarters in Saudi Arabia concerning their finances and operations, including without limitation, annual reports, balance sheets, financial statements, bank account summaries, and audits.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 64

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted and followed by WAMY by which charitable contributions are either made to and/or raised by You, how those contributions are collected and accounted for, how it is determined to which charitable designees financial or other forms of support should be distributed, the means by which financial or other forms of support are subsequently disbursed to charitable designees, and the means to ensure that such distributions are being used for charitable purposes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 65

Please provide all documents relating to the involvement of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in determining how funds collected by WAMY's branch offices outside of Saudi Arabia should be allocated and/or in the distribution of funds collected by the offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 66

Please provide all documents relating to any written or oral communications between WAMY and the KSA and/or SAMA regarding anti-terrorism policies, practices or procedures. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 67

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted by WAMY concerning the acceptance and distribution of monetary donations, which were implemented and used, or are currently being used, to prevent or deter financial crimes such as money laundering or the facilitation of terrorism financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 68

Please provide all documents in relating in any way to WAMY meetings, correspondence, statements, or other communications concerning terrorist financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 69

Please provide all summaries of contributions received and/or disbursements made by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and vague. In addition the request asks the Defendant to prepare a summary for Plaintiffs which is extremely burdensome. The request does not seek discovery with sufficient particularity. Plaintiffs' request is not limited in scope to the subject matter of this litigation.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 70

Please provide all information contained in any database maintained by You, identifying or relating to the sources of funds contributed to WAMY, and/or the destination of funds distributed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 71

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (a/Ida the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 72

Please provide all documents WAMY sent to and/or received from the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (aAda the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 73

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies, or papers.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 74

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in advancing the foreign policy objectives of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 75

Please provide all documents relating to all accounts in any United States, Saudi Arabian, or foreign banking or financial institution You currently hold, or have held, jointly with the KSA, any members of the Saudi royal family, or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You currently hold or have held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 76

Please provide all documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of WAMY, including any subsidiary, affiliate, and/or branch office.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 77

Please provide all documents relating to WAMY's initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 78

Please provide all documents defining, establishing, or relating to WAMY's privileges, obligations, activities, and/or rights under the laws of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and limited to the subject matter of this litigation.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 79

Please provide all documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to WAMY, including but not limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over WAMY's operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 80

Please provide all documents relating to any fundraising events and/or conferences that were held for the benefit of WAMY and were promoted, sponsored, organized, funded, managed, attended, or supervised by the KSA, any member of the Saudi family, and/or any Saudi official acting on behalf of the KSA. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 81

Please provide all documents relating to any meeting between officers or representatives of WAMY and any official or agency of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with

sufficient particularity. The scope of this request is too broad and not limited by subject matter. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 82

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and each of the Charities identified in Attachment D. In the event that WAMY, including any subsidiary, affiliate, and/or branch office shared office space with any of the Charities identified in Attachment D, please provide such documents.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 83

Please provide all documents WAMY sent to, and/or received from the Charities identified in Attachment D, including without limitation, all documents relating to the transfer of funds between WAMY and those Charities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 84

Please provide all documents relating to any joint fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY and any of the Charities identified in Attachment D. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 85

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the Charities identified in Attachment D, and/or any accounts over which WAMY currently holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 86

Please provide all documents relating to all information or notification WAMY received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 87

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 88

Please provide all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague,

erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 89

Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 90

Provide copies of any and all laws, statutes, regulations, ordinances, or royal decrees which would have prohibited any Islamic charity or benevolent association from: (i) engaging in conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) providing material support or resources to al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and harassing. The documents requested are available to Plaintiffs from other public sources.

Request No. 91

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Benevolence International Foundation ("BIF"), including but not limited to, documents relating to shared office space or common employees of WAMY and BIF, including the branch offices of WAMY and BIF.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 92

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's and BIF's joint publication and distribution of the book titled *Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if they have already been established. Subject to and without waiving these objections, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 93

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 94

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 95

Please provide all documents You sent to, and/or received from any third party relating to the alleged involvement of WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek

discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "extremist activity" and "radical." Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 96

Please provide all documents You sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "extremist activity" and "radical." Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 97

Please provide all documents relating to any internal investigations conducted by WAMY and/or WAMY Personnel into any alleged criminal, corrupt, or extremist activities of any individual or entity employed by and/or affiliated with WAMY, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Plaintiffs' request is vague and ambiguous as to the definition of "extremist activity" and "radical." Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 98

Please provide all documents relating to any action taken by WAMY and/or WAMY Personnel to prevent criminal activities, including the sponsorship of terrorists or radicals, by any individual or entity employed by and/or affiliated with WAMY or any of its branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 99

Please provide all documents relating to any action undertaken by WAMY and/or WAMY Personnel to remove or purge radical or corrupt elements or individuals from WAMY's branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 100

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY subsidiary, affiliate, branch office, officer, director, trustee, board member, committee member, manager, agent, employee, volunteer, and/or

representative as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 101

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY supporter, donor, supplier, contributor, facilitator, speakers, foreign government supporters, business supporters, or banks as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents at this time.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 102

Please provide all documents relating to any individual currently detained or incarcerated in Cuba, Afghanistan, or elsewhere in connection with the global war on terrorism, including without limitation, all documents relating to any meetings, interviews, or dialogue WAMY and/or WAMY Personnel have had with individuals held at Guantanamo Bay.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously

assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 103

Please provide all documents relating to any WAMY Personnel who have been arrested, detained, or incarcerated in connection with the global war on terrorism, including without limitation, any and all employment records for such individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 104

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, any and all documents relating to any positions such individuals currently hold, or have held, within WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 105

Please provide any and all documents WAMY sent to, and/or received from any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, all documents relating to the transfer of funds between WAMY and such entities and/or individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Request No. 106

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of any Saar Network-Related Entity and/or any Saar Network-Related Individual, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Request No. 107

Please provide all documents relating to any formal or informal record keeping and document retention policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 108

Please provide all documents relating to any formal or informal document destruction policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY

subsidiary or affiliate, including without limitation, descriptions of all documents destroyed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs.

To the extent that its answer is not responsive, Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Dated: January 28, 2011

Sincerely,

/s/ Omar T. Mohammedi
Omar T. Mohammedi, Esq.
Law Firm of Omar T. Mohammedi, LLC
Woolworth Building
233 Broadway, Suite 801
New York, NY 10279
*Attorneys for World Assembly of Muslim Youth Saudi
Arabia and World Assembly of Muslim Youth International*

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of January 2011, I caused a copy of Defendants World Assembly of Muslim Youth Saudi Arabia's Supplemental Responses to Plaintiffs' Requests for Production of Documents to be served by electronic mail upon Plaintiffs' Executive Committee:

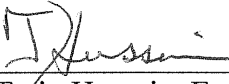
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New York, NY 10017-2703
For the *Ashton* Plaintiffs and Plaintiffs Executive Committees

I further certify that I served the same via regular first class mail to Sean Carter, Cozen O'Connor, 1900 Market Street, Philadelphia, PA 19103.



Tariq Hussain, Esq.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977

Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970

Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978

Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279

Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al.,
No. 04-CV-1923

*World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development
Corp., et al.*, No. 04-CV-07280

**DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA'S
SUPPLEMENTAL RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF
DOCUMENTS**

Defendant World Assembly of Muslim Youth Saudi Arabia ("WAMY Saudi Arabia"),
through undersigned counsel, hereby responds to Plaintiffs' Request for Production of
Documents.

GENERAL OBJECTIONS

1. Defendant WAMY Saudi Arabia objects to plaintiffs' "Definitions" and
Document Requests insofar as they:
 - a. Request information or identification of documents concerning confidential
communications between defendant and its attorneys, on the grounds that the
information sought is protected under the attorney/client privilege;
 - b. Request information or identification of documents prepared by Defendant's
counsel for their own use, or prepared by Defendant or Defendant's witnesses

for use by Defendant's counsel, on the grounds that the information sought is protected from disclosure by the attorney work-product doctrine;

- c. Seek to enlarge Defendant's obligation to respond to discovery beyond the obligations established by the Federal Rules of Civil Procedure and the Local Rules of this Court;
- d. Seek discovery from Defendant of documents that are in the possession, custody or control of another entity other than WAMY Saudi Arabia.
- e. Seek information or documents to which plaintiffs have an equal or greater access than Defendant.
- f. Seek information or documents prior to the year 1992 pursuant to Judge Daniel's Order of December 21, 2007 (Docket No. 2059) limiting discovery relating back to the period beginning in 1992.

2. Defendant has made a diligent and reasonable search and inquiry for the information requested by the requests. Any response contained herein, however, is given with the understanding that WAMY Saudi Arabia and its attorneys are still conducting discovery and investigation in connection with this action. Defendant's responses are therefore without waiver of, or prejudice to, its right to later use additional information not set forth or referred to in this response. In addition, any response contained herein is made with the express reservation of all rights pursuant to the Federal Rules of Civil Procedure and Local Civil Rules of this Court to supplement or amend these responses or to present evidence either discovered subsequent to the date hereof, or the significance of which is later discovered.

3. In its specific responses below, Defendant's statement that responsive documents will be made available for inspection does not mean (a) that any documents exist or (b) that they are in the possession, custody, or control of the Defendant.
4. Defendant is legally separate from any affiliates or branch offices that may also carry the name "WAMY." Defendant is not in custody or control of documents in the possession of any such affiliate or branch office.
5. Any documents produced herein designated as "Confidential" shall be subject to Judge Casey's Order of Protection of October 3, 2006.
6. The above-stated General Objections are hereby incorporated in each of WAMY Saudi Arabia's following responses to specific requests, whether or not expressly repeated in response to a particular request.

DOCUMENT REQUESTS

Request No. 1

Please provide all documents relating to all accounts in United States banking institutions ("U.S. Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY and its representatives had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the United States banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with

sufficient particularity. WAMY directs Plaintiffs to send a subpoena to the banks to receive such documents. Such request should be for the period between 1992-2002 Subject to and without waiving these objections, Defendant has submitted these documents on behalf of WAMY International.

Request No. 2

Please provide all documents relating to all accounts at the Habib Bank in Peshawar, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Habib Bank, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendants are still searching for responsive documents at this time.

Request No. 3

Please provide all documents relating to all accounts at the Emirate Bank International in Islamabad, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account No. 1155-701647 and/or any such accounts associated with Alifuddin Turabi. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY, Alifuddin Turabi and the Emirate Bank International, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad and unduly burdensome and erroneously assumes disputed facts and allegations as if established. Subject to and without waiving this objection, Defendant refers Plaintiffs to the attached index.

Request No. 4

Please provide all documents relating to all accounts at the Al Rajhi Banking and Investment Corp. established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account Nos. 110608010425160 and 279608010024887. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Al Rajhi Banking and Investment Corp., documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index. WAMY is still searching for additional responsive documents.

Request No. 5

Please provide all documents relating to all other accounts in foreign banking institutions ("Foreign Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the foreign banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant refers Plaintiffs to the attached index.

Request No. 6

Please provide all documents relating to any investigation, inquiry, review, audit or analysis conducted by any United States state or federal governmental entity, agency and/or department, or any United States-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "United States Investigator"), any foreign government or any foreign-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "Foreign Investigator"), or by the Kingdom of Saudi Arabia or any Saudi Arabian-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "KSA Investigator"), which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, WAMY refers to WAMY International's response to Plaintiffs' requests.

Request No. 7

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's response and the attached index.

Request No. 8

Please provide all documents relating to any investigation, audit, analysis, examination, survey, or review of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above, conducted either by WAMY, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the KSA and/or the Saudi Arabian Monetary Agency ("SAMA").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant makes responsive documents available for inspection at its offices in Riyadh and/or Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 9

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs at its offices in Riyadh and/or Jeddah, Saudi Arabia. WAMY refers Plaintiffs to the attached index.

Request No. 10

Please provide all documents relating to any investigation or inquiries conducted by the Islamic Republic of Pakistan concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, Pakistan's investigation and decision to deport WAMY personnel from that country in or around October 2001.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously

assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity Subject to and without waiving any objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 11

Please provide all documents relating to the 2002 raid on WAMY's Pakistan office, conducted by authorities of the Islamic Republic of Pakistan, including without limitation, copies of all documents and things which were seized by Pakistani authorities between September 11, 2001 and the present.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. In addition, responsive documents may be subject to attorney-client or work product privilege. WAMY refers Plaintiffs to the attached index.

Request No. 12

Please provide all documents relating to the 2002 detainment of a WAMY employee by authorities of the Islamic Republic of Pakistan for delivering a tape-recorded message from Osama Bin Laden to an Arab television network.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts as if they have already been established. No employee from WAMY referred to in this request delivered any tape from Osama Bin Laden to an Arab Television network.

Subject to and without waiving these objections, WAMY has no responsive documents.

Request No. 13

Please provide all documents relating to any investigation or inquiries conducted by the Republic of India concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing or otherwise supporting Islamic terror groups in the Kashmir region such as Students Islamic Movement of India ("SIMI"), Lashkar-e-Taibah, and Hizbul Mujahideen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, such as WAMY Saudi Arabia “supporting Islamic terror groups in the Kashmir region” and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents. WAMY refers Plaintiffs to the attached index.

Request No. 14

Please provide all documents relating to the 2002 arrests of two men attempting to transfer money, given to them by WAMY official Nazir Qureshi, to Kashmiri terrorist groups.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The cited groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents. WAMY refers Plaintiffs to the attached index.

Request No. 15

Please provide all documents relating to any investigation or inquiries conducted by Romanian authorities concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, the alleged involvement of WAMY in an al Qaida plot to hijack a plane and crash it into London's Heathrow Airport.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. WAMY Saudi Arabia has no knowledge of this alleged plot. Subject to and without waiving these objections, Defendant has no responsive documents. If Plaintiffs allege such a claim, they should be in the best position to offer this evidence.

Request No. 16

Please provide all documents relating to any investigation or inquiries conducted by the Russian Federation concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation,

allegations that WAMY was financing and otherwise supporting Islamic terrorists and separatists in Chechnya.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 17

Please provide all documents relating to any investigation or inquiries conducted by the Republic of the Philippines concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, accusations by the Philippines Government that WAMY was financing the Moro Islamic Liberation Front ("MILF") terrorist organization.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts and allegations as if established such as WAMY Saudi Arabia's "support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities." Defendant objects to Plaintiffs' request that it does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents. WAMY refers Plaintiffs to the attached index.

Request No. 18

Please provide all documents relating to any investigation or inquiries conducted by the Federal Republic of Germany concerning Ibrahim El Zayat (formerly the Western European Head of WAMY), including without limitation, any investigation regarding the transfer of money by El Zayat and Ayman Sayed Ahmed Aly on behalf of WAMY to the Albanian branch of Taibah International, an Islamic charity whose Bosnian branch was designated as a Specially Designated Global Terrorist Entity in 2004 by the United States and United Nations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is irrelevant, overbroad, unduly burdensome and

erroneously assumes disputed facts and allegations as if established, such as WAMY Saudi Arabia transferring money to branch of Taibah International. The request does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents. WAMY refers Plaintiffs to the attached index.

Request No. 19

Please provide all documents relating to the 2002 raid of WAMY's offices in Virginia, conducted by U.S. authorities, including without limitation, copies of all documents and things which were seized by U.S. authorities between September 11, 2001 and the present.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, duplicative, and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's production of documents. . WAMY refers plaintiffs to the attached index.

Request No. 20

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents at this time. WAMY refers Plaintiffs to the attached index.

Request No. 21

Please provide all documents WAMY sent to, and/or received from the person and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), including without limitation, all documents relating to the transfer of funds between WAMY and those persons and entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with

the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents at this time. WAMY refers Plaintiffs to the attached index.

Request No. 22

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 23

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons identified in Attachment B. For those persons who currently hold, or have held, positions within WAMY, responsive documents shall include, but are not limited to, their personnel files.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 24

Please provide all documents WAMY sent to, and/or received from the persons identified in Attachment B, including without limitation, all documents relating to the transfer of funds between WAMY and those persons.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek

discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 25

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons identified in Attachment B, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 26

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the entities identified in Attachment C.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 27

Please provide all documents WAMY sent to, and/or received from the entities identified in Attachment C, including without limitation, all documents relating to the transfer of funds between WAMY and those entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably

calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 28

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the entities identified in Attachment C, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 29

Please provide all documents relating to any investigation or inquiry conducted by any United States Investigator, Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs at its offices in Riyadh and/or Jeddah Saudi Arabia. WAMY refers Plaintiffs to the attached index.

Request No. 30

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to the attached index.

Request No. 31

Please provide all documents relating to any internal investigation or inquiry conducted by WAMY and/or WAMY Personnel which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include any investigation or inquiry ordered, conducted, supervised, overseen, or reviewed by the KSA and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 32

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 33

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 34

Please provide all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or associated with WAMY, was associated with or involved in any military or terrorist activity, plot or attack, indicating an intention to direct conduct against or target conduct toward the United States of America.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "military activity, plot or attack." Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 35

Please provide any and all documents relating to any sanctions imposed upon WAMY and/or WAMY Personnel by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 36

Please provide all documents relating to the struggle against the Soviet occupation of Afghanistan during the 1980s, including without limitation, WAMY's involvement.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 37

Please provide all documents relating to WAMY's role in providing material support or resources, directly or indirectly, to the mujihadeen forces in Afghanistan in their struggle against the Soviet occupation during the 1980s. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 38

Please provide all documents relating to WAMY's role in providing material support or resources to the mujihadeen forces or other Islamic fighters in Afghanistan, Albania, Algeria, Bosnia, Chechnya, Egypt, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Somalia, Sudan, Tanzania, Turkey, Yemen, or elsewhere, including without limitation, the support of camps in and/or around those areas, recruitment, training, transportation, lodging, the acquisition, trafficking, and/or smuggling of weapons and arms such as rockets, mortars, rifles, dynamite and other bombs, and the provision of boots, tents, and uniforms.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and

not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." The conflicts, crises or conditions referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 39

Please provide all documents authored, published, or disseminated by WAMY relating to the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several "conflicts, crises or conditions" referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 40

Please provide all documents relating to fundraising activities conducted by WAMY in relation to relief or humanitarian efforts, or other operations, in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 41

Please provide all interviews, statements, or speeches by WAMY Personnel regarding the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several “conflicts, crises or conditions” referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 42

Please provide all documents authored, published, or disseminated by WAMY discussing the legitimacy of any armed jihad or resistance by Muslims in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Plaintiffs’ request is irrelevant insofar as many of the named conflicts, crises and conditions have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 43

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to mujahideen forces in any part of the World. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome and

erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of “mujahideen forces.” Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 44

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to any armed jihad in any part of the World, regardless of whether such jihad was declared legitimate by competent religious authorities. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of “financial, medical, logistical, administrative, religious and political assistance.” Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 45

Please provide all interviews, statements, or speeches by WAMY Personnel which mention "jihad" (*see* Definition No. 18), regardless of whether you believe such individual(s) was or was not acting within the scope of his employment at WAMY in relation to such activity.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs’ overbroad definition of *jihad*. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 46

Please provide all documents authored, published, or disseminated by WAMY which mention "jihad" (*see* Definition No. 18), including without limitation: *Islamic Views; Islamic Camps: Objectives, Program Outlines, Preparatory Steps; Military Lessons in the Jihad Against the Tyrants; A Handy Encyclopedia Of Contemporary Religions & Sects; and Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established such as the publication of *Military Lessons in the Jihad Against the Tyrants*. Defendant objects to Plaintiffs' overbroad definition of *jihad*. With respect to the listed books, Plaintiffs are already in possession of them. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 47

Please provide all WAMY documents mentioning "jihad" (*see* Definition No. 18), which can be generated via an electronic search of WAMY's computers or electronic data storage systems.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs' overbroad definition of *jihad*.

Request No. 48

Please provide a list of all publications, newspapers, newsletters, books, reports, pamphlets, videotapes, audiotapes, and/or websites published, authored, and/or financed in whole or in part, by the WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to the attached index.

Request No. 49

Please provide all documents illustrating, describing or otherwise relating to WAMY's formation and organizational structure, the date of incorporation, the state of incorporation, the duration of WAMY's existence, any documents relating to WAMY's initial capitalization and

subsequent funding, and/or any other writing relating to the creation or purpose of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to attached index.

Request No. 50

Please provide all documents relating to the administration, governance, and longterm strategic decision-making of WAMY (including any subsidiary, affiliate, or branch office), including without limitation, articles of incorporation, by-laws, corporate charters, mission statements, constitutions, documents relating to the duties and powers of any boards and/or committees, statements of purpose, and/or any other related writing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity to WAMY Saudi Arabia. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to attached index.

Request No. 51

Please provide all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of WAMY, including without limitation, the Kashmir Muslim Youth Committee and the Camps and Conference Committee.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to attached index.

Request No. 52

Please provide all documents identifying each officer, director, trustee, board member, and/or committee member of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 53

Please provide all documents relating to any meetings of officers, directors, trustees, managers, boards, committees, and/or internal bodies of WAMY, including without limitation, any agendas or meeting minutes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to attached index.

Request No. 54

Please provide all financial statements, balance sheets, income statements, and annual reports for WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to WAMY International's document production. WAMY also refers Plaintiffs to attached index.

Request No. 55

Please provide all documents relating to any audit, analysis, examination, survey, or review of WAMY's bank accounts, investments, assets, capital, and/or financial affairs, conducted either by employees of WAMY or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY also refers Plaintiffs to attached index.

Request No. 56

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents identifying projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter. WAMY refers Plaintiffs to the attached index.

Request No. 57

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents summarizing the funds allocated by WAMY to projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter. WAMY refers Plaintiffs to the attached index.

Request No. 58

Please provide all documents relating to any fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY. Such documents shall include, but are not limited to, advertisements, promotional materials, invitations to the event, press releases issued in connection with the event, lists of sponsors and attendees, documents identifying the purpose of the fundraiser or conference, materials distributed at the event, written receipts and/or records of the monies collected, written receipts and/or records of how those monies were used and/or distributed, lists of donors, lists of speakers, videos or slides shown at the event, and transcripts, broadcasts, audiotape and/or videotapes of the event.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 59

Please provide all documents relating to the relationship between WAMY's Saudi headquarters and WAMY's branch offices worldwide, including but not limited to the WAMY offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 60

Please provide all documents relating to the role of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in the fundraising efforts of WAMY's offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 61

Please provide all documents relating to the relationships between and among WAMY's branch offices worldwide, including but not limited to the WAMY's offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 62

Please provide all directives, instructions, and/or communications sent by any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of any WAMY office worldwide to the WAMY offices in the United States.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter.

Request No. 63

Please provide all annual, semi-annual and periodic reports submitted by the WAMY branch offices to WAMY headquarters in Saudi Arabia concerning their finances and operations, including without limitation, annual reports, balance sheets, financial statements, bank account summaries, and audits.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to attached index.

Request No. 64

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted and followed by WAMY by which charitable contributions are either made to and/or raised by You, how those contributions are collected and accounted for, how it is determined to which charitable designees financial or other forms of support should be distributed, the means by which financial or other forms of support are subsequently disbursed to charitable designees, and the means to ensure that such distributions are being used for charitable purposes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, duplicative not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY also refers Plaintiffs to attached index.

Request No. 65

Please provide all documents relating to the involvement of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in determining how funds collected by WAMY's branch offices outside of Saudi Arabia should be allocated and/or in the distribution of funds collected by the offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections,

Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to attached index.

Request No. 66

Please provide all documents relating to any written or oral communications between WAMY and the KSA and/or SAMA regarding anti-terrorism policies, practices or procedures. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 67

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted by WAMY concerning the acceptance and distribution of monetary donations, which were implemented and used, or are currently being used, to prevent or deter financial crimes such as money laundering or the facilitation of terrorism financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, duplicative and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to attached index.

Request No. 68

Please provide all documents in relating in any way to WAMY meetings, correspondence, statements, or other communications concerning terrorist financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek

discovery with sufficient particularity. Subject to and without waiving these objections, WAMY does not have responsive documents.

Request No. 69

Please provide all summaries of contributions received and/or disbursements made by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and vague. In addition the request asks the Defendant to prepare a summary for Plaintiffs which is extremely burdensome. The request does not seek discovery with sufficient particularity. Plaintiffs' request is not limited in scope to the subject matter of this litigation. WAMY refers Plaintiffs to the attached index.

Request No. 70

Please provide all information contained in any database maintained by You, identifying or relating to the sources of funds contributed to WAMY, and/or the destination of funds distributed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter.

Request No. 71

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (a/Ida the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not

reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation. WAMY refers Plaintiffs to the attached index.

Request No. 72

Please provide all documents WAMY sent to and/or received from the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (aAda the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation. WAMY refers Plaintiffs to the attached index.

Request No. 73

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies, or papers.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation. WAMY also refers plaintiffs to the attached index.

Request No. 74

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in advancing the foreign policy objectives of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with

sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation. WAMY also refers plaintiffs to the attached index.

Request No. 75

Please provide all documents relating to all accounts in any United States, Saudi Arabian, or foreign banking or financial institution You currently hold, or have held, jointly with the KSA, any members of the Saudi royal family, or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You currently hold or have held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation. WAMY also refers plaintiffs to the attached index.

Request No. 76

Please provide all documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of WAMY, including any subsidiary, affiliate, and/or branch office.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation. WAMY refers Plaintiffs to the attached index.

Request No. 77

Please provide all documents relating to WAMY's initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation. WAMY also refers plaintiffs to the attached index.

Request No. 78

Please provide all documents defining, establishing, or relating to WAMY's privileges, obligations, activities, and/or rights under the laws of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and limited to the subject matter of this litigation. WAMY refers Plaintiffs to the attached index.

Request No. 79

Please provide all documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to WAMY, including but not limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over WAMY's operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 80

Please provide all documents relating to any fundraising events and/or conferences that were held for the benefit of WAMY and were promoted, sponsored, organized, funded, managed, attended, or supervised by the KSA, any member of the Saudi family, and/or any Saudi official acting on behalf of the KSA. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 81

Please provide all documents relating to any meeting between officers or representatives of WAMY and any official or agency of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation. WAMY refers Plaintiffs to the attached index.

Request No. 82

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and each of the Charities identified in Attachment D. In the event that WAMY, including any subsidiary, affiliate, and/or branch office shared office space with any of the Charities identified in Attachment D, please provide such documents.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 83

Please provide all documents WAMY sent to, and/or received from the Charities identified in Attachment D, including without limitation, all documents relating to the transfer of funds between WAMY and those Charities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 84

Please provide all documents relating to any joint fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY and any of the Charities identified in Attachment D. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. Defendant has no responsive documents.

Request No. 85

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the Charities identified in Attachment D, and/or any accounts over which WAMY currently holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 86

Please provide all documents relating to all information or notification WAMY received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any

individual or entity employed by and/or affiliated with those Charities, was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 87

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 88

Please provide all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and

does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 89

Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents

Request No. 90

Provide copies of any and all laws, statutes, regulations, ordinances, or royal decrees which would have prohibited any Islamic charity or benevolent association from: (i) engaging in conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) providing material support or resources to al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and harassing. The documents requested are available to Plaintiffs from other public sources.

Request No. 91

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Benevolence International Foundation ("BIF"), including but not limited to, documents relating to shared office space or common employees of WAMY and BIF, including the branch offices of WAMY and BIF.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to the attached index.

Request No. 92

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's and BIF's joint publication and distribution of the book titled *Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if they have already been established. The request does not specify the period or offer a time frame. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 93

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 94

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing

material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. . Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 95

Please provide all documents You sent to, and/or received from any third party relating to the alleged involvement of WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 96

Please provide all documents You sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "extremist activity" and "radical." Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 97

Please provide all documents relating to any internal investigations conducted by WAMY and/or WAMY Personnel into any alleged criminal, corrupt, or extremist activities of any individual or entity employed by and/or affiliated with WAMY, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to the attached index.

Request No. 98

Please provide all documents relating to any action taken by WAMY and/or WAMY Personnel to prevent criminal activities, including the sponsorship of terrorists or radicals, by any individual or entity employed by and/or affiliated with WAMY or any of its branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Subject to and without waiving these objections, WAMY refers plaintiffs to the attached index.

Request No. 99

Please provide all documents relating to any action undertaken by WAMY and/or WAMY Personnel to remove or purge radical or corrupt elements or individuals from WAMY's branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Subject to and without waiving these objections, WAMY refers Plaintiffs to the attached index.

Request No. 100

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY subsidiary, affiliate, branch office, officer, director, trustee, board member, committee member, manager, agent, employee, volunteer, and/or representative as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. . Subject to and without waiving these objections, WAMY refers Plaintiffs to the attached index.

Request No. 101

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY supporter, donor, supplier, contributor, facilitator, speakers, foreign government supporters, business supporters, or banks as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents at this time.

Request No. 102

Please provide all documents relating to any individual currently detained or incarcerated in Cuba, Afghanistan, or elsewhere in connection with the global war on terrorism, including without limitation, all documents relating to any meetings, interviews, or dialogue WAMY and/or WAMY Personnel have had with individuals held at Guantanamo Bay

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents. WAMY also refers plaintiffs to the attached index

Request No. 103

Please provide all documents relating to any WAMY Personnel who have been arrested, detained, or incarcerated in connection with the global war on terrorism, including without limitation, any and all employment records for such individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents. WAMY refers Plaintiffs to the attached index.

Request No. 104

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, any and all documents relating to any positions such individuals currently hold, or have held, within WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to the attached index.

Request No. 105

Please provide any and all documents WAMY sent to, and/or received from any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, all documents relating to the transfer of funds between WAMY and such entities and/or individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to the attached index.

Request No. 106

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of any Saar Network-Related Entity and/or any Saar Network-Related Individual, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiting these objections, Defendant has no responsive documents.

Request No. 107

Please provide all documents relating to any formal or informal record keeping and document retention policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome duplicative and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to attached index.

Request No. 108

Please provide all documents relating to any formal or informal document destruction policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate, including without limitation, descriptions of all documents destroyed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents

Dated: November 15, 2011

Sincerely,

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Arabia and World Assembly of Muslim Youth International*

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of November 2011, I caused a copy of Defendants World Assembly of Muslim Youth Saudi Arabia's Supplemental Responses to Plaintiffs' Requests for Production of Documents to be served by electronic mail upon Plaintiffs' Executive Committee:

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/s/
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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977

Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970

Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978

Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279

Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al.,
No. 04-CV-1923

*World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development
Corp., et al.*, No. 04-CV-07280

**DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA'S
SUPPLEMENTAL RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF
DOCUMENTS**

Defendant World Assembly of Muslim Youth Saudi Arabia ("WAMY Saudi Arabia"),
through undersigned counsel, hereby responds to Plaintiffs' Request for Production of
Documents.

GENERAL OBJECTIONS

1. Defendant WAMY Saudi Arabia objects to plaintiffs' "Definitions" and
Document Requests insofar as they:
 - a. Request information or identification of documents concerning confidential
communications between defendant and its attorneys, on the grounds that the
information sought is protected under the attorney/client privilege;
 - b. Request information or identification of documents prepared by Defendant's
counsel for their own use, or prepared by Defendant or Defendant's witnesses

for use by Defendant's counsel, on the grounds that the information sought is protected from disclosure by the attorney work-product doctrine;

- c. Seek to enlarge Defendant's obligation to respond to discovery beyond the obligations established by the Federal Rules of Civil Procedure and the Local Rules of this Court;
 - d. Seek information or documents to which plaintiffs have an equal or greater access than Defendant.
 - e. Seek information or documents prior to the year 1992 pursuant to Judge Daniel's Order of December 21, 2007 (Docket No. 2059) limiting discovery relating back to the period beginning in 1992.
2. Defendant has made a diligent and reasonable search and inquiry for the information requested by the requests. Any response contained herein, however, is given with the understanding that WAMY Saudi Arabia and its attorneys are still conducting discovery and investigation in connection with this action. Defendant's responses are therefore without waiver of, or prejudice to, its right to later use additional information not set forth or referred to in this response. In addition, any response contained herein is made with the express reservation of all rights pursuant to the Federal Rules of Civil Procedure and Local Civil Rules of this Court to supplement or amend these responses or to present evidence either discovered subsequent to the date hereof, or the significance of which is later discovered.
3. In its specific responses below, Defendant's statement that responsive documents will be made available for inspection does not mean that any documents exist.

4. Any documents produced herein designated as “Confidential” shall be subject to Judge Casey’s Order of Protection of October 3, 2006.
5. The above-stated General Objections are hereby incorporated in each of WAMY Saudi Arabia’s following responses to specific requests, whether or not expressly repeated in response to a particular request.

DOCUMENT REQUESTS

Request No. 1

Please provide all documents relating to all accounts in United States banking institutions ("U.S. Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY and its representatives had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the United States banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. WAMY directs Plaintiffs to send a subpoena to the banks to receive such documents. Such request should be for the period between 1992-2002. Subject to and without waiving these objections, Defendant has submitted these documents on behalf of WAMY International. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 2

Please provide all documents relating to all accounts at the Habib Bank in Peshawar, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among

WAMY and Habib Bank, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendants are still searching for responsive documents at this time. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 3

Please provide all documents relating to all accounts at the Emirate Bank International in Islamabad, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account No. 1155-701647 and/or any such accounts associated with Alifuddin Turabi. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY, Alifuddin Turabi and the Emirate Bank International, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad and unduly burdensome and erroneously assumes disputed facts and allegations as if established. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 4

Please provide all documents relating to all accounts at the Al Rajhi Banking and Investment Corp. established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account Nos. 110608010425160 and 279608010024887. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda,

notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Al Rajhi Banking and Investment Corp., documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 5

Please provide all documents relating to all other accounts in foreign banking institutions ("Foreign Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the foreign banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 6

Please provide all documents relating to any investigation, inquiry, review, audit or analysis conducted by any United States state or federal governmental entity, agency and/or department, or any United States-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "United States Investigator"), any foreign government or any foreign-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "Foreign Investigator"), or by the Kingdom of Saudi Arabia or any Saudi Arabian-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "KSA Investigator"), which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, WAMY refers to WAMY International's response to Plaintiffs' requests.

Request No. 7

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's response.

Request No. 8

Please provide all documents relating to any investigation, audit, analysis, examination, survey, or review of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above, conducted either by WAMY, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the KSA and/or the Saudi Arabian Monetary Agency ("SAMA").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously

assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 9

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 10

Please provide all documents relating to any investigation or inquiries conducted by the Islamic Republic of Pakistan concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, Pakistan's investigation and decision to deport WAMY personnel from that country in or around October 2001.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving any objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 11

Please provide all documents relating to the 2002 raid on WAMY's Pakistan office, conducted by authorities of the Islamic Republic of Pakistan, including without limitation, copies of all documents and things which were seized by Pakistani authorities between September 11, 2001 and the present.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. In addition, responsive documents may be subject to attorney-client or work product privilege. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 12

Please provide all documents relating to the 2002 detainment of a WAMY employee by authorities of the Islamic Republic of Pakistan for delivering a tape-recorded message from Osama Bin Laden to an Arab television network.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts as if they have already been established. No employee from WAMY referred to in this request delivered any tape from Osama Bin Laden to an Arab Television network.

Subject to and without waiving these objections, WAMY has no responsive documents.

Request No. 13

Please provide all documents relating to any investigation or inquiries conducted by the Republic of India concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing or otherwise supporting Islamic terror groups in the Kashmir region such as Students Islamic Movement of India ("SIMI"), Lashkar-e-Taibah, and Hizbul Mujahideen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, such as WAMY Saudi Arabia "supporting Islamic terror groups in the Kashmir region" and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 14

Please provide all documents relating to the 2002 arrests of two men attempting to transfer money, given to them by WAMY official Nazir Qureshi, to Kashmiri terrorist groups.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The cited groups have nothing to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 15

Please provide all documents relating to any investigation or inquiries conducted by Romanian authorities concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, the alleged involvement of WAMY in an al Qaida plot to hijack a plane and crash it into London's Heathrow Airport.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. WAMY Saudi Arabia has no knowledge of this alleged plot. Subject to and without waiving these objections, Defendant has no responsive documents. If Plaintiffs allege such a claim, they should be in the best position to offer this evidence.

Request No. 16

Please provide all documents relating to any investigation or inquiries conducted by the Russian Federation concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing and otherwise supporting Islamic terrorists and separatists in Chechnya.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 17

Please provide all documents relating to any investigation or inquiries conducted by the Republic of the Philippines concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, accusations by the Philippines Government that WAMY was financing the Moro Islamic Liberation Front ("MILF") terrorist organization.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts and allegations as if established such as WAMY Saudi Arabia's "support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities." Defendant objects to Plaintiffs' request that it does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 18

Please provide all documents relating to any investigation or inquiries conducted by the Federal Republic of Germany concerning Ibrahim El Zayat (formerly the Western European Head of WAMY), including without limitation, any investigation regarding the transfer of money by El Zayat and Ayman Sayed Ahmed Aly on behalf of WAMY to the Albanian branch of Taibah International, an Islamic charity whose Bosnian branch was designated as a Specially Designated Global Terrorist Entity in 2004 by the United States and United Nations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is irrelevant, overbroad, unduly burdensome and erroneously assumes disputed facts and allegations as if established, such as WAMY Saudi Arabia transferring money to branch of Taibah International. The request does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 19

Please provide all documents relating to the 2002 raid of WAMY's offices in Virginia, conducted by U.S. authorities, including without limitation, copies of all documents and things which were seized by U.S. authorities between September 11, 2001 and the present.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, duplicative, and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's production of documents. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 20

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 21

Please provide all documents WAMY sent to, and/or received from the person and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), including without limitation, all documents relating to the transfer of funds between WAMY and those persons and entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 22

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 23

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons identified in Attachment B. For those persons who currently hold, or have held, positions within WAMY, responsive documents shall include, but are not limited to, their personnel files.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 001113-001123. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 24

Please provide all documents WAMY sent to, and/or received from the persons identified in Attachment B, including without limitation, all documents relating to the transfer of funds between WAMY and those persons.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 001113-001123. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 25

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons identified in Attachment B, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 26

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the entities identified in Attachment C.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 27

Please provide all documents WAMY sent to, and/or received from the entities identified in Attachment C, including without limitation, all documents relating to the transfer of funds between WAMY and those entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 28

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the entities identified in Attachment C, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 29

Please provide all documents relating to any investigation or inquiry conducted by any United States Investigator, Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs at its offices in Riyadh, Saudi Arabia. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 30

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with

sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 31

Please provide all documents relating to any internal investigation or inquiry conducted by WAMY and/or WAMY Personnel which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include any investigation or inquiry ordered, conducted, supervised, overseen, or reviewed by the KSA and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 32

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 33

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 34

Please provide all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or associated with WAMY, was associated with or involved in any military or terrorist activity, plot or attack, indicating an intention to direct conduct against or target conduct toward the United States of America.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "military activity, plot or attack."

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 35

Please provide any and all documents relating to any sanctions imposed upon WAMY and/or WAMY Personnel by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 36

Please provide all documents relating to the struggle against the Soviet occupation of Afghanistan during the 1980s, including without limitation, WAMY's involvement.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 37

Please provide all documents relating to WAMY's role in providing material support or resources, directly or indirectly, to the mujihadeen forces in Afghanistan in their struggle against the Soviet occupation during the 1980s. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 38

Please provide all documents relating to WAMY's role in providing material support or resources to the mujihadeen forces or other Islamic fighters in Afghanistan, Albania, Algeria, Bosnia, Chechnya, Egypt, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Somalia, Sudan, Tanzania, Turkey, Yemen, or elsewhere, including without limitation, the support of camps in and/or around those areas, recruitment, training, transportation, lodging, the acquisition, trafficking, and/or smuggling of weapons and arms such as rockets, mortars, rifles, dynamite and other bombs, and the provision of boots, tents, and uniforms.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and

not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." The conflicts, crises or conditions referred to have nothing to do with the subject matter of this litigation.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 39

Please provide all documents authored, published, or disseminated by WAMY relating to the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several "conflicts, crises or conditions" referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 40

Please provide all documents relating to fundraising activities conducted by WAMY in relation to relief or humanitarian efforts, or other operations, in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 41

Please provide all interviews, statements, or speeches by WAMY Personnel regarding the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several “conflicts, crises or conditions” referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 42

Please provide all documents authored, published, or disseminated by WAMY discussing the legitimacy of any armed jihad or resistance by Muslims in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Plaintiffs’ request is irrelevant insofar as many of the named conflicts, crises and conditions have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 43

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to mujahideen forces in any part of the World. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome and erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of “mujahideen forces.”

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 44

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to any armed jihad in any part of the World, regardless of whether such jihad was declared legitimate by competent religious authorities. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of “financial, medical, logistical, administrative, religious and political assistance.”

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 45

Please provide all interviews, statements, or speeches by WAMY Personnel which mention "jihad" (*see* Definition No. 18), regardless of whether you believe such individual(s) was or was not acting within the scope of his employment at WAMY in relation to such activity.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs’ overbroad definition of *jihad*. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 46

Please provide all documents authored, published, or disseminated by WAMY which mention "jihad" (*see* Definition No. 18), including without limitation: *Islamic Views; Islamic Camps: Objectives, Program Outlines, Preparatory Steps; Military Lessons in the Jihad Against the Tyrants; A Handy Encyclopedia Of Contemporary Religions & Sects*; and *Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established such as the publication of *Military Lessons in the Jihad Against the Tyrants*. Defendant objects to Plaintiffs' overbroad definition of *jihad*. With respect to the listed books, Plaintiffs are already in possession of them. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 47

Please provide all WAMY documents mentioning "jihad" (*see* Definition No. 18), which can be generated via an electronic search of WAMY's computers or electronic data storage systems.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs' overbroad definition of *jihad*.

Request No. 48

Please provide a list of all publications, newspapers, newsletters, books, reports, pamphlets, videotapes, audiotapes, and/or websites published, authored, and/or financed in whole or in part, by the WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY

refers Plaintiffs to WAMY SA 000184-000201, 000272-000344, 000496-000503. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 49

Please provide all documents illustrating, describing or otherwise relating to WAMY's formation and organizational structure, the date of incorporation, the state of incorporation, the duration of WAMY's existence, any documents relating to WAMY's initial capitalization and subsequent funding, and/or any other writing relating to the creation or purpose of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 50

Please provide all documents relating to the administration, governance, and longterm strategic decision-making of WAMY (including any subsidiary, affiliate, or branch office), including without limitation, articles of incorporation, by-laws, corporate charters, mission statements, constitutions, documents relating to the duties and powers of any boards and/or committees, statements of purpose, and/or any other related writing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity to WAMY Saudi Arabia. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 001038-001083, 001095-001112. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 51

Please provide all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of WAMY, including without limitation, the Kashmir Muslim Youth Committee and the Camps and Conference Committee.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 52

Please provide all documents identifying each officer, director, trustee, board member, and/or committee member of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 001084-001094. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 53

Please provide all documents relating to any meetings of officers, directors, trustees, managers, boards, committees, and/or internal bodies of WAMY, including without limitation, any agendas or meeting minutes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 54

Please provide all financial statements, balance sheets, income statements, and annual reports for WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. WAMY refers Plaintiffs to WAMY International's document production. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 000020-000183, 000201-000271, 000345-000395. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 55

Please provide all documents relating to any audit, analysis, examination, survey, or review of WAMY's bank accounts, investments, assets, capital, and/or financial affairs, conducted either by employees of WAMY or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 56

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents identifying projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too

broad and not limited by subject matter. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 000504-000935, 001191-001218. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 57

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents summarizing the funds allocated by WAMY to projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 58

Please provide all documents relating to any fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY. Such documents shall include, but are not limited to, advertisements, promotional materials, invitations to the event, press releases issued in connection with the event, lists of sponsors and attendees, documents identifying the purpose of the fundraiser or conference, materials distributed at the event, written receipts and/or records of the monies collected, written receipts and/or records of how those monies were used and/or distributed, lists of donors, lists of speakers, videos or slides shown at the event, and transcripts, broadcasts, audiotape and/or videotapes of the event.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 59

Please provide all documents relating to the relationship between WAMY's Saudi headquarters and WAMY's branch offices worldwide, including but not limited to the WAMY

offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 001124-001133. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 60

Please provide all documents relating to the role of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in the fundraising efforts of WAMY's offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 61

Please provide all documents relating to the relationships between and among WAMY's branch offices worldwide, including but not limited to the WAMY's offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 62

Please provide all directives, instructions, and/or communications sent by any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of any WAMY office worldwide to the WAMY offices in the United States.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter.

Request No. 63

Please provide all annual, semi-annual and periodic reports submitted by the WAMY branch offices to WAMY headquarters in Saudi Arabia concerning their finances and operations, including without limitation, annual reports, balance sheets, financial statements, bank account summaries, and audits.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 64

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted and followed by WAMY by which charitable contributions are either made to and/or raised by You, how those contributions are collected and accounted for, how it is determined to which charitable designees financial or other forms of support should be distributed, the means by which financial or other forms of support are subsequently disbursed to

charitable designees, and the means to ensure that such distributions are being used for charitable purposes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, duplicative not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 001134-001190. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 65

Please provide all documents relating to the involvement of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in determining how funds collected by WAMY's branch offices outside of Saudi Arabia should be allocated and/or in the distribution of funds collected by the offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 66

Please provide all documents relating to any written or oral communications between WAMY and the KSA and/or SAMA regarding anti-terrorism policies, practices or procedures. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 00134-001190. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 67

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted by WAMY concerning the acceptance and distribution of monetary donations, which were implemented and used, or are currently being used, to prevent or deter financial crimes such as money laundering or the facilitation of terrorism financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, duplicative and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 001134-00190. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 68

Please provide all documents in relating in any way to WAMY meetings, correspondence, statements, or other communications concerning terrorist financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, WAMY does not have responsive documents.

Request No. 69

Please provide all summaries of contributions received and/or disbursements made by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and vague. In addition the request asks the Defendant to prepare a summary for Plaintiffs which is extremely burdensome. The request does not seek discovery with sufficient particularity. Plaintiffs' request is not limited in scope to the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 70

Please provide all information contained in any database maintained by You, identifying or relating to the sources of funds contributed to WAMY, and/or the destination of funds distributed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 71

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (a/Ida the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 72

Please provide all documents WAMY sent to and/or received from the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (aAda the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 73

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies, or papers.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 74

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in advancing the foreign policy objectives of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 75

Please provide all documents relating to all accounts in any United States, Saudi Arabian, or foreign banking or financial institution You currently hold, or have held, jointly with the KSA, any members of the Saudi royal family, or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You currently hold or have held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably

calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 76

Please provide all documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of WAMY, including any subsidiary, affiliate, and/or branch office.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 77

Please provide all documents relating to WAMY's initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 78

Please provide all documents defining, establishing, or relating to WAMY's privileges, obligations, activities, and/or rights under the laws of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and limited to the subject matter of this litigation.

Request No. 79

Please provide all documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to WAMY, including but not limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over WAMY's operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 80

Please provide all documents relating to any fundraising events and/or conferences that were held for the benefit of WAMY and were promoted, sponsored, organized, funded, managed, attended, or supervised by the KSA, any member of the Saudi family, and/or any Saudi official acting on behalf of the KSA. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 81

Please provide all documents relating to any meeting between officers or representatives of WAMY and any official or agency of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 82

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and each of the Charities identified in Attachment D. In the event that WAMY, including any subsidiary, affiliate, and/or branch office shared office space with any of the Charities identified in Attachment D, please provide such documents.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 83

Please provide all documents WAMY sent to, and/or received from the Charities identified in Attachment D, including without limitation, all documents relating to the transfer of funds between WAMY and those Charities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 84

Please provide all documents relating to any joint fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY and any of the Charities identified in Attachment D. Responsive documents shall include, but are not limited to,

correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 85

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the Charities identified in Attachment D, and/or any accounts over which WAMY currently holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 86

Please provide all documents relating to all information or notification WAMY received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 87

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 88

Please provide all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 89

Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents

Request No. 90

Provide copies of any and all laws, statutes, regulations, ordinances, or royal decrees which would have prohibited any Islamic charity or benevolent association from: (i) engaging in conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) providing material support or resources to al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and harassing. The documents requested are available to Plaintiffs from other public sources.

Request No. 91

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Benevolence International Foundation ("BIF"), including but not limited to, documents relating to shared office space or common employees of WAMY and BIF, including the branch offices of WAMY and BIF.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 92

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's and BIF's joint publication and distribution of the book titled *Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if they have already been established. The request does not specify the period or offer a time frame.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 93

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 94

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague,

erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents at this time. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 95

Please provide all documents You sent to, and/or received from any third party relating to the alleged involvement of WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 96

Please provide all documents You sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "extremist activity" and "radical."

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 97

Please provide all documents relating to any internal investigations conducted by WAMY and/or WAMY Personnel into any alleged criminal, corrupt, or extremist activities of any individual or entity employed by and/or affiliated with WAMY, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 98

Please provide all documents relating to any action taken by WAMY and/or WAMY Personnel to prevent criminal activities, including the sponsorship of terrorists or radicals, by any individual or entity employed by and/or affiliated with WAMY or any of its branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 99

Please provide all documents relating to any action undertaken by WAMY and/or WAMY Personnel to remove or purge radical or corrupt elements or individuals from WAMY's branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 100

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY subsidiary, affiliate, branch office, officer, director, trustee, board member, committee member, manager, agent, employee, volunteer, and/or representative as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 101

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY supporter, donor, supplier, contributor, facilitator, speakers, foreign government supporters, business supporters, or banks as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents at this time.

Request No. 102

Please provide all documents relating to any individual currently detained or incarcerated in Cuba, Afghanistan, or elsewhere in connection with the global war on terrorism, including without limitation, all documents relating to any meetings, interviews, or dialogue WAMY and/or WAMY Personnel have had with individuals held at Guantanamo Bay

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY

refers Plaintiffs to WAMY SA 000001-000019, 000936-001037, 001084-001094. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 103

Please provide all documents relating to any WAMY Personnel who have been arrested, detained, or incarcerated in connection with the global war on terrorism, including without limitation, any and all employment records for such individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 000001-000019, 001084-001094. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 104

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, any and all documents relating to any positions such individuals currently hold, or have held, within WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 105

Please provide any and all documents WAMY sent to, and/or received from any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, all documents relating to the transfer of funds between WAMY and such entities and/or individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome,

erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity

Request No. 106

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of any Saar Network-Related Entity and/or any Saar Network-Related Individual, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiting these objections, Defendant has no responsive documents.

Request No. 107

Please provide all documents relating to any formal or informal record keeping and document retention policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome duplicative and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 108

Please provide all documents relating to any formal or informal document destruction policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate, including without limitation, descriptions of all documents destroyed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents.

Dated: March 15, 2012

Sincerely,

/s/ Omar T. Mohammedi
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*Attorneys for World Assembly of Muslim Youth Saudi
Arabia and World Assembly of Muslim Youth International*

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of March 2012, I caused an electronic copy of Defendants World Assembly of Muslim Youth Saudi Arabia's Supplemental Responses to Plaintiffs' Requests for Production of Documents to be produced on a DVD and served by Federal Express upon:

Robert Haefele
MOTLEY RICE LLC
28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, SC 29465
(rhaefele@motleyrice.com)
For the *Burnett* Plaintiffs and the Plaintiffs' Executive Committees

/s/ Sarah Hasan
Sarah Hasan, Esq.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977

Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970

Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978

Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279

Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al.,
No. 04-CV-1923

*World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development
Corp., et al.*, No. 04-CV-07280

**DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA'S
SUPPLEMENTAL RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF
DOCUMENTS**

Defendant World Assembly of Muslim Youth Saudi Arabia ("WAMY Saudi Arabia"),
through undersigned counsel, hereby responds to Plaintiffs' Request for Production of
Documents.

GENERAL OBJECTIONS

1. Defendant WAMY Saudi Arabia objects to plaintiffs' "Definitions" and
Document Requests insofar as they:
 - a. Request information or identification of documents concerning confidential
communications between defendant and its attorneys, on the grounds that the
information sought is protected under the attorney/client privilege;
 - b. Request information or identification of documents prepared by Defendant's
counsel for their own use, or prepared by Defendant or Defendant's witnesses

for use by Defendant's counsel, on the grounds that the information sought is protected from disclosure by the attorney work-product doctrine;

- c. Seek to enlarge Defendant's obligation to respond to discovery beyond the obligations established by the Federal Rules of Civil Procedure and the Local Rules of this Court;
 - d. Seek information or documents to which plaintiffs have an equal or greater access than Defendant.
 - e. Seek information or documents prior to the year 1992 pursuant to Judge Daniel's Order of December 21, 2007 (Docket No. 2059) limiting discovery relating back to the period beginning in 1992.
2. Defendant has made a diligent and reasonable search and inquiry for the information requested by the requests. Any response contained herein, however, is given with the understanding that WAMY Saudi Arabia and its attorneys are still conducting discovery and investigation in connection with this action. Defendant's responses are therefore without waiver of, or prejudice to, its right to later use additional information not set forth or referred to in this response. In addition, any response contained herein is made with the express reservation of all rights pursuant to the Federal Rules of Civil Procedure and Local Civil Rules of this Court to supplement or amend these responses or to present evidence either discovered subsequent to the date hereof, or the significance of which is later discovered.
3. In its specific responses below, Defendant's statement that responsive documents will be made available for inspection does not mean that any documents exist.

4. Any documents produced herein designated as “Confidential” shall be subject to Judge Casey’s Order of Protection of October 3, 2006.
5. The above-stated General Objections are hereby incorporated in each of WAMY Saudi Arabia’s following responses to specific requests, whether or not expressly repeated in response to a particular request.

DOCUMENT REQUESTS

Request No. 1

Please provide all documents relating to all accounts in United States banking institutions ("U.S. Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY and its representatives had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the United States banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. WAMY directs Plaintiffs to send a subpoena to the banks to receive such documents. Such request should be for the period between 1992-2002. Subject to and without waiving these objections, Defendant has submitted these documents on behalf of WAMY International. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 2

Please provide all documents relating to all accounts at the Habib Bank in Peshawar, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among

WAMY and Habib Bank, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendants are still searching for responsive documents at this time. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 3

Please provide all documents relating to all accounts at the Emirate Bank International in Islamabad, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account No. 1155-701647 and/or any such accounts associated with Alifuddin Turabi. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY, Alifuddin Turabi and the Emirate Bank International, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad and unduly burdensome and erroneously assumes disputed facts and allegations as if established. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 4

Please provide all documents relating to all accounts at the Al Rajhi Banking and Investment Corp. established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account Nos. 110608010425160 and 279608010024887. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda,

notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Al Rajhi Banking and Investment Corp., documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 5

Please provide all documents relating to all other accounts in foreign banking institutions ("Foreign Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the foreign banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, WAMY refers Plaintiffs to WAMY SA 1360-1364. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 6

Please provide all documents relating to any investigation, inquiry, review, audit or analysis conducted by any United States state or federal governmental entity, agency and/or department, or any United States-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "United States Investigator"), any foreign government or any foreign-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "Foreign Investigator"), or by the Kingdom of Saudi Arabia or any Saudi Arabian-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "KSA Investigator"), which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, WAMY refers to WAMY International's response to Plaintiffs' requests.

Request No. 7

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's response.

Request No. 8

Please provide all documents relating to any investigation, audit, analysis, examination, survey, or review of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above, conducted either by WAMY, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the KSA and/or the Saudi Arabian Monetary Agency ("SAMA").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 9

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 10

Please provide all documents relating to any investigation or inquiries conducted by the Islamic Republic of Pakistan concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, Pakistan's investigation and decision to deport WAMY personnel from that country in or around October 2001.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving any objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 11

Please provide all documents relating to the 2002 raid on WAMY's Pakistan office, conducted by authorities of the Islamic Republic of Pakistan, including without limitation, copies

of all documents and things which were seized by Pakistani authorities between September 11, 2001 and the present.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. In addition, responsive documents may be subject to attorney-client or work product privilege. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 12

Please provide all documents relating to the 2002 detainment of a WAMY employee by authorities of the Islamic Republic of Pakistan for delivering a tape-recorded message from Osama Bin Laden to an Arab television network.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts as if they have already been established. No employee from WAMY referred to in this request delivered any tape from Osama Bin Laden to an Arab Television network.

Subject to and without waiving these objections, WAMY has no responsive documents.

Request No. 13

Please provide all documents relating to any investigation or inquiries conducted by the Republic of India concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing or otherwise supporting Islamic terror groups in the Kashmir region such as Students Islamic Movement of India ("SIMI"), Lashkar-e-Taibah, and Hizbul Mujahideen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, such as WAMY Saudi Arabia "supporting Islamic terror groups in the Kashmir region" and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 14

Please provide all documents relating to the 2002 arrests of two men attempting to transfer money, given to them by WAMY official Nazir Qureshi, to Kashmiri terrorist groups.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The cited groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1488-1487.. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 15

Please provide all documents relating to any investigation or inquiries conducted by Romanian authorities concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, the alleged involvement of WAMY in an al Qaida plot to hijack a plane and crash it into London's Heathrow Airport.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. WAMY Saudi Arabia has no knowledge of this alleged plot. Subject to and without waiving these objections, Defendant has no responsive documents. If Plaintiffs allege such a claim, they should be in the best position to offer this evidence.

Request No. 16

Please provide all documents relating to any investigation or inquiries conducted by the Russian Federation concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing and otherwise supporting Islamic terrorists and separatists in Chechnya.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant further objects

on the ground that the referenced groups have nothing to do with the subject matter of this litigation.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 17

Please provide all documents relating to any investigation or inquiries conducted by the Republic of the Philippines concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, accusations by the Philippines Government that WAMY was financing the Moro Islamic Liberation Front ("MILF") terrorist organization.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts and allegations as if established such as WAMY Saudi Arabia's "support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities." Defendant objects to Plaintiffs' request that it does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 18

Please provide all documents relating to any investigation or inquiries conducted by the Federal Republic of Germany concerning Ibrahim El Zayat (formerly the Western European Head of WAMY), including without limitation, any investigation regarding the transfer of money by El Zayat and Ayman Sayed Ahmed Aly on behalf of WAMY to the Albanian branch of Taibah International, an Islamic charity whose Bosnian branch was designated as a Specially Designated Global Terrorist Entity in 2004 by the United States and United Nations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is irrelevant, overbroad, unduly burdensome and erroneously assumes disputed facts and allegations as if established, such as WAMY Saudi Arabia transferring money to branch of Taibah International. The request does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 19

Please provide all documents relating to the 2002 raid of WAMY's offices in Virginia, conducted by U.S. authorities, including without limitation, copies of all documents and things which were seized by U.S. authorities between September 11, 2001 and the present.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, duplicative, and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's production of documents. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 20

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 21

Please provide all documents WAMY sent to, and/or received from the person and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), including without limitation, all documents relating to the transfer of funds between WAMY and those persons and entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 22

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 23

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons identified in Attachment B. For those persons who currently hold, or have held, positions within WAMY, responsive documents shall include, but are not limited to, their personnel files.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1354-1359. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 24

Please provide all documents WAMY sent to, and/or received from the persons identified in Attachment B, including without limitation, all documents relating to the transfer of funds between WAMY and those persons.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh,

Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1354-1359. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 25

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons identified in Attachment B, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 26

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the entities identified in Attachment C.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 27

Please provide all documents WAMY sent to, and/or received from the entities identified in Attachment C, including without limitation, all documents relating to the transfer of funds between WAMY and those entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed

facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 28

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the entities identified in Attachment C, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 29

Please provide all documents relating to any investigation or inquiry conducted by any United States Investigator, Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh and/or Jeddah, Saudi Arabia with costs to Plaintiffs at its offices in Riyadh, Saudi Arabia. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 30

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 31

Please provide all documents relating to any internal investigation or inquiry conducted by WAMY and/or WAMY Personnel which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include any investigation or inquiry ordered, conducted, supervised, overseen, or reviewed by the KSA and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 32

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 33

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 34

Please provide all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or associated with WAMY, was associated with or involved in any military or terrorist activity, plot or attack, indicating an intention to direct conduct against or target conduct toward the United States of America.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "military activity, plot or attack."

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 35

Please provide any and all documents relating to any sanctions imposed upon WAMY and/or WAMY Personnel by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 36

Please provide all documents relating to the struggle against the Soviet occupation of Afghanistan during the 1980s, including without limitation, WAMY's involvement.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 37

Please provide all documents relating to WAMY's role in providing material support or resources, directly or indirectly, to the mujihadeen forces in Afghanistan in their struggle against the Soviet occupation during the 1980s. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 38

Please provide all documents relating to WAMY's role in providing material support or resources to the mujihadeen forces or other Islamic fighters in Afghanistan, Albania, Algeria, Bosnia, Chechnya, Egypt, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Somalia, Sudan, Tanzania, Turkey, Yemen, or elsewhere, including without limitation, the support of camps in and/or around those areas, recruitment, training, transportation, lodging, the acquisition, trafficking, and/or smuggling of weapons and arms such as rockets, mortars, rifles, dynamite and other bombs, and the provision of boots, tents, and uniforms.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "mujahideen forces." The conflicts, crises or conditions referred to have nothing to do with the subject matter of this litigation.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 39

Please provide all documents authored, published, or disseminated by WAMY relating to the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several "conflicts, crises or conditions" referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 40

Please provide all documents relating to fundraising activities conducted by WAMY in relation to relief or humanitarian efforts, or other operations, in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY

refers Plaintiffs to WAMY SA 1219-1230. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 41

Please provide all interviews, statements, or speeches by WAMY Personnel regarding the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several “conflicts, crises or conditions” referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1219-1230. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 42

Please provide all documents authored, published, or disseminated by WAMY discussing the legitimacy of any armed jihad or resistance by Muslims in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Plaintiffs’ request is irrelevant insofar as many of the named conflicts, crises and conditions have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 43

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to mujahideen forces in any part of the World. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome and erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of “mujahideen forces.”

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 44

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to any armed jihad in any part of the World, regardless of whether such jihad was declared legitimate by competent religious authorities. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of “financial, medical, logistical, administrative, religious and political assistance.”

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 45

Please provide all interviews, statements, or speeches by WAMY Personnel which mention "jihad" (*see* Definition No. 18), regardless of whether you believe such individual(s) was or was not acting within the scope of his employment at WAMY in relation to such activity.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs’ overbroad definition of *jihad*. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 46

Please provide all documents authored, published, or disseminated by WAMY which mention "jihad" (*see* Definition No. 18), including without limitation: *Islamic Views; Islamic Camps: Objectives, Program Outlines, Preparatory Steps; Military Lessons in the Jihad Against the Tyrants; A Handy Encyclopedia Of Contemporary Religions & Sects*; and *Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established such as the publication of *Military Lessons in the Jihad Against the Tyrants*. Defendant objects to Plaintiffs' overbroad definition of *jihad*. With respect to the listed books, Plaintiffs are already in possession of them. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 47

Please provide all WAMY documents mentioning "jihad" (*see* Definition No. 18), which can be generated via an electronic search of WAMY's computers or electronic data storage systems.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs' overbroad definition of *jihad*.

Request No. 48

Please provide a list of all publications, newspapers, newsletters, books, reports, pamphlets, videotapes, audiotapes, and/or websites published, authored, and/or financed in whole or in part, by the WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek

discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 49

Please provide all documents illustrating, describing or otherwise relating to WAMY's formation and organizational structure, the date of incorporation, the state of incorporation, the duration of WAMY's existence, any documents relating to WAMY's initial capitalization and subsequent funding, and/or any other writing relating to the creation or purpose of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 50

Please provide all documents relating to the administration, governance, and longterm strategic decision-making of WAMY (including any subsidiary, affiliate, or branch office), including without limitation, articles of incorporation, by-laws, corporate charters, mission statements, constitutions, documents relating to the duties and powers of any boards and/or committees, statements of purpose, and/or any other related writing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity to WAMY Saudi Arabia. Subject to and without waiving these objections, Defendant will make responsive documents relevant to WAMY Saudi Arabia available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1597-1633. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 51

Please provide all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of WAMY, including without limitation, the Kashmir Muslim Youth Committee and the Camps and Conference Committee.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1231-1251, 1524-1596. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 52

Please provide all documents identifying each officer, director, trustee, board member, and/or committee member of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1231-1251, 1524-1596. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 53

Please provide all documents relating to any meetings of officers, directors, trustees, managers, boards, committees, and/or internal bodies of WAMY, including without limitation, any agendas or meeting minutes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1231-1251. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 54

Please provide all financial statements, balance sheets, income statements, and annual reports for WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's document production. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1664-1681. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 55

Please provide all documents relating to any audit, analysis, examination, survey, or review of WAMY's bank accounts, investments, assets, capital, and/or financial affairs, conducted either by employees of WAMY or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 56

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents identifying projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1262-1353, 1370-1386, 1494-1523, 1642-1663. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 57

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents summarizing the funds allocated by WAMY to projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1262-1353, 1370-1380, 1494-1523, 1642-1663. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 58

Please provide all documents relating to any fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY. Such documents shall include, but are not limited to, advertisements, promotional materials, invitations to the event, press releases issued in connection with the event, lists of sponsors and attendees, documents identifying the purpose of the fundraiser or conference, materials distributed at the event, written receipts and/or records of the monies collected, written receipts and/or records of how those monies were used and/or distributed, lists of donors, lists of speakers, videos or slides shown at the event, and transcripts, broadcasts, audiotape and/or videotapes of the event.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1262-1353, 1370-1380, 1494-1523, 1642-1663. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 59

Please provide all documents relating to the relationship between WAMY's Saudi headquarters and WAMY's branch offices worldwide, including but not limited to the WAMY offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY further objects to the extent it does not have custody or control over its branch offices worldwide. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1387-1487, 1634-1641, 1745-1901. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 60

Please provide all documents relating to the role of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in the fundraising efforts of WAMY's offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY further objects to the extent it does not have custody or control over its branch offices worldwide. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 61

Please provide all documents relating to the relationships between and among WAMY's branch offices worldwide, including but not limited to the WAMY's offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY further objects to the extent it does not have custody or control over its branch offices worldwide. Subject to and without waiving these

objections, WAMY refers Plaintiffs to WAMY SA 1745-1901. Defendant reserves the right to supplement its response as discovery is ongoing.

Request No. 62

Please provide all directives, instructions, and/or communications sent by any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of any WAMY office worldwide to the WAMY offices in the United States.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter. WAMY further objects to the extent it does not have custody or control over its branch offices worldwide.

Request No. 63

Please provide all annual, semi-annual and periodic reports submitted by the WAMY branch offices to WAMY headquarters in Saudi Arabia concerning their finances and operations, including without limitation, annual reports, balance sheets, financial statements, bank account summaries, and audits.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY further objects to the extent it does not have custody or control over its branch offices worldwide. Subject to and without waiving these objections, Defendants refer Plaintiffs to WAMY SA 1664-1681. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 64

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted and followed by WAMY by which charitable contributions are either made to and/or raised by You, how those contributions are collected and accounted for, how it is determined to which charitable designees financial or other forms of support should be distributed, the means by which financial or other forms of support are subsequently disbursed to charitable designees, and the means to ensure that such distributions are being used for charitable purposes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, duplicative not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 65

Please provide all documents relating to the involvement of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in determining how funds collected by WAMY's branch offices outside of Saudi Arabia should be allocated and/or in the distribution of funds collected by the offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 66

Please provide all documents relating to any written or oral communications between WAMY and the KSA and/or SAMA regarding anti-terrorism policies, practices or procedures. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs.. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 67

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted by WAMY concerning the acceptance and distribution of monetary

donations, which were implemented and used, or are currently being used, to prevent or deter financial crimes such as money laundering or the facilitation of terrorism financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, duplicative and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 68

Please provide all documents in relating in any way to WAMY meetings, correspondence, statements, or other communications concerning terrorist financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, WAMY does not have responsive documents.

Request No. 69

Please provide all summaries of contributions received and/or disbursements made by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and vague. In addition the request asks the Defendant to prepare a summary for Plaintiffs which is extremely burdensome. The request does not seek discovery with sufficient particularity. Plaintiffs' request is not limited in scope to the subject matter of this litigation. Subject to and without waiving its objections, WAMY refers Plaintiffs to WAMY SA 1252-1261, 1365-1369, 1403-1415. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 70

Please provide all information contained in any database maintained by You, identifying or relating to the sources of funds contributed to WAMY, and/or the destination of funds distributed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 71

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (a/Ida the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 72

Please provide all documents WAMY sent to and/or received from the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (a/Ada the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not

reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 73

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies, or papers.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 74

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in advancing the foreign policy objectives of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 75

Please provide all documents relating to all accounts in any United States, Saudi Arabian, or foreign banking or financial institution You currently hold, or have held, jointly with the KSA, any members of the Saudi royal family, or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You currently hold or have held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 76

Please provide all documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of WAMY, including any subsidiary, affiliate, and/or branch office.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 77

Please provide all documents relating to WAMY's initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 78

Please provide all documents defining, establishing, or relating to WAMY's privileges, obligations, activities, and/or rights under the laws of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and limited to the subject matter of this litigation.

Request No. 79

Please provide all documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to WAMY, including but not

limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over WAMY's operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 80

Please provide all documents relating to any fundraising events and/or conferences that were held for the benefit of WAMY and were promoted, sponsored, organized, funded, managed, attended, or supervised by the KSA, any member of the Saudi family, and/or any Saudi official acting on behalf of the KSA. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 81

Please provide all documents relating to any meeting between officers or representatives of WAMY and any official or agency of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with

sufficient particularity. The scope of this request is too broad and not limited by subject matter. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 82

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and each of the Charities identified in Attachment D. In the event that WAMY, including any subsidiary, affiliate, and/or branch office shared office space with any of the Charities identified in Attachment D, please provide such documents.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1682-1744. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 83

Please provide all documents WAMY sent to, and/or received from the Charities identified in Attachment D, including without limitation, all documents relating to the transfer of funds between WAMY and those Charities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 84

Please provide all documents relating to any joint fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY and any of the Charities identified in Attachment D. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 85

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the Charities identified in Attachment D, and/or any accounts over which WAMY currently holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 86

Please provide all documents relating to all information or notification WAMY received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 87

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including

without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 88

Please provide all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 89

Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents

Request No. 90

Provide copies of any and all laws, statutes, regulations, ordinances, or royal decrees which would have prohibited any Islamic charity or benevolent association from: (i) engaging in conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) providing material support or resources to al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and harassing. The documents requested are available to Plaintiffs from other public sources.

Request No. 91

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Benevolence International Foundation ("BIF"), including but not limited to, documents relating to shared office space or common employees of WAMY and BIF, including the branch offices of WAMY and BIF.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1682-1744. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 92

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's and BIF's joint publication and distribution of the book titled *Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes

disputed facts and allegations as if they have already been established. The request does not specify the period or offer a time frame.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 93

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 94

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents at this time. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 95

Please provide all documents You sent to, and/or received from any third party relating to the alleged involvement of WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 96

Please provide all documents You sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "extremist activity" and "radical."

Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 97

Please provide all documents relating to any internal investigations conducted by WAMY and/or WAMY Personnel into any alleged criminal, corrupt, or extremist activities of any individual or entity employed by and/or affiliated with WAMY, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 98

Please provide all documents relating to any action taken by WAMY and/or WAMY Personnel to prevent criminal activities, including the sponsorship of terrorists or radicals, by any individual or entity employed by and/or affiliated with WAMY or any of its branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 99

Please provide all documents relating to any action undertaken by WAMY and/or WAMY Personnel to remove or purge radical or corrupt elements or individuals from WAMY's branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." WAMY further objects to the extent that it does not have custody or control over its branch offices worldwide. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 100

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY subsidiary, affiliate, branch office, officer, director, trustee, board member, committee member, manager, agent, employee, volunteer, and/or representative as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 101

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY supporter, donor, supplier, contributor, facilitator, speakers, foreign government supporters, business supporters, or banks as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents at this time.

Request No. 102

Please provide all documents relating to any individual currently detained or incarcerated in Cuba, Afghanistan, or elsewhere in connection with the global war on terrorism, including without limitation, all documents relating to any meetings, interviews, or dialogue WAMY and/or WAMY Personnel have had with individuals held at Guantanamo Bay

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 103

Please provide all documents relating to any WAMY Personnel who have been arrested, detained, or incarcerated in connection with the global war on terrorism, including without limitation, any and all employment records for such individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 104

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, any and all documents relating to any positions such individuals currently hold, or have held, within WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 105

Please provide any and all documents WAMY sent to, and/or received from any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, all documents relating to the transfer of funds between WAMY and such entities and/or individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Request No. 106

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of any Saar Network-Related Entity and/or any Saar Network-Related Individual, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Subject to and without waiting these objections, Defendant has no responsive documents.

Request No. 107

Please provide all documents relating to any formal or informal record keeping and document retention policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome duplicative and does not seek discovery with sufficient particularity. Defendant reserves the right to supplement this answer as discovery in this case is ongoing.

Request No. 108

Please provide all documents relating to any formal or informal document destruction policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate, including without limitation, descriptions of all documents destroyed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity.

Subject to and without waiving these objections, Defendant has no responsive documents.

Dated: April 30, 2012

Sincerely,

/s/ Omar T. Mohammedi
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*Attorneys for World Assembly of Muslim Youth Saudi
Arabia and World Assembly of Muslim Youth International*

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April 2012, I caused an electronic copy of Defendants World Assembly of Muslim Youth Saudi Arabia's Supplemental Responses to Plaintiffs' Requests for Production of Documents to be produced on a DVD and served by Federal Express upon:

Robert Haefele
MOTLEY RICE LLC
28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, SC 29465
(rhaefele@motleyrice.com)
For the *Burnett* Plaintiffs and the Plaintiffs' Executive Committees

/s/ Sarah Hasan
Sarah Hasan, Esq.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977

Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738

Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970

Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978

Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279

Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al,
No. 04-CV-1923

World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., No. 04-CV-07280

**DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA'S
SUPPLEMENTAL RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF
DOCUMENTS**

Defendant World Assembly of Muslim Youth Saudi Arabia ("WAMY Saudi Arabia"), through undersigned counsel, hereby responds to Plaintiffs' Request for Production of Documents.

GENERAL OBJECTIONS

1. Defendant WAMY Saudi Arabia objects to plaintiffs' "Definitions" and Document Requests insofar as they:
 - a. Request information or identification of documents concerning confidential communications between defendant and its attorneys, on the grounds that the information sought is protected under the attorney/client privilege;
 - b. Request information or identification of documents prepared by Defendant's counsel for their own use, or prepared by Defendant or Defendant's witnesses

for use by Defendant's counsel, on the grounds that the information sought is protected from disclosure by the attorney work-product doctrine;

- c. Seek to enlarge Defendant's obligation to respond to discovery beyond the obligations established by the Federal Rules of Civil Procedure and the Local Rules of this Court;
 - d. Seek information or documents to which plaintiffs have an equal or greater access than Defendant.
 - e. Seek information or documents prior to the year 1992 pursuant to Judge Daniel's Order of December 21, 2007 (Docket No. 2059) limiting discovery relating back to the period beginning in 1992.
2. Defendant has made a diligent and reasonable search and inquiry for the information requested by the requests. Any response contained herein, however, is given with the understanding that WAMY Saudi Arabia and its attorneys are still conducting discovery and investigation in connection with this action. Defendant's responses are therefore without waiver of, or prejudice to, its right to later use additional information not set forth or referred to in this response. In addition, any response contained herein is made with the express reservation of all rights pursuant to the Federal Rules of Civil Procedure and Local Civil Rules of this Court to supplement or amend these responses or to present evidence either discovered subsequent to the date hereof, or the significance of which is later discovered.
3. In its specific responses below, Defendant's statement that responsive documents will be made available for inspection does not mean that any documents exist.

4. Any documents produced herein designated as "Confidential" shall be subject to Judge Casey's Order of Protection of October 3, 2006.
5. The above-stated General Objections are hereby incorporated in each of WAMY Saudi Arabia's following responses to specific requests, whether or not expressly repeated in response to a particular request.

DOCUMENT REQUESTS

Request No. 1

Please provide all documents relating to all accounts in United States banking institutions ("U.S. Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY and its representatives had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the United States banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. WAMY directs Plaintiffs to send a subpoena to the banks to receive such documents. Such request should be for the period between 1992-2002 subject to and without waiving these objections; Defendant has submitted these documents on behalf of WAMY International.

Request No. 2

Please provide all documents relating to all accounts at the Habib Bank in Peshawar, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Habib Bank, documents detailing the establishment of and/or closing of the

account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity.

Request No. 3

Please provide all documents relating to all accounts at the Emirate Bank International in Islamabad, Pakistan, established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account No. 1155-701647 and/or any such accounts associated with Alifuddin Turabi. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY, Alifuddin Turabi and the Emirate Bank International, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad and unduly burdensome and erroneously assumes disputed facts and allegations as if established.

Request No. 4

Please provide all documents relating to all accounts at the Al Rajhi Banking and Investment Corp. established or held in the name of, on behalf of and/or for the benefit of the WAMY, including without limitation, Account Nos. 110608010425160 and 279608010024887. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and Al Rajhi Banking and Investment Corp., documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals,

deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity.

Request No. 5

Please provide all documents relating to all other accounts in foreign banking institutions ("Foreign Bank Accounts") established or held in the name of, on behalf of and/or for the benefit of WAMY, any account for any entity in which WAMY held any beneficial interest, and/or any account over which WAMY had signatory authority or had any actual or potential beneficial interest. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and the foreign banking institutions, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, WAMY refers Plaintiffs to WAMY SA 1360-1364, previously produced.

Request No. 6

Please provide all documents relating to any investigation, inquiry, review, audit or analysis conducted by any United States state or federal governmental entity, agency and/or department, or any United States-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "United States Investigator"), any foreign government or any foreign-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "Foreign Investigator"), or by the Kingdom of Saudi Arabia or any Saudi Arabian-based regulatory body, law enforcement agency,

grand jury, bank, financial institution, accountant, or auditor (collectively "KSA Investigator"), which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, WAMY refers to WAMY International's response to Plaintiffs' requests.

Request No. 7

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's response.

Request No. 8

Please provide all documents relating to any investigation, audit, analysis, examination, survey, or review of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 above, conducted either by WAMY, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the KSA and/or the Saudi Arabian Monetary Agency ("SAMA").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity.

Request No. 9

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses any of the WAMY accounts

identified in, and/or in response to, Requests Nos. 1-5 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, WAMY refers Plaintiffs to WAMY SA 1902-2025.

Request No. 10

Please provide all documents relating to any investigation or inquiries conducted by the Islamic Republic of Pakistan concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, Pakistan's investigation and decision to deport WAMY personnel from that country in or around October 2001.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. Subject to and without waiving this objection, WAMY refers Plaintiffs to WAMY SA 1902-2025.

Request No. 11

Please provide all documents relating to the 2002 raid on WAMY's Pakistan office, conducted by authorities of the Islamic Republic of Pakistan, including without limitation, copies of all documents and things which were seized by Pakistani authorities between September 11, 2001 and the present.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. In addition, responsive documents may be subject to attorney-client or work product privilege. Subject to and without waiving this objection, WAMY refers Plaintiffs to WAMY SA 1902-2025.

Request No. 12

Please provide all documents relating to the 2002 detainment of a WAMY employee by authorities of the Islamic Republic of Pakistan for delivering a tape-recorded message from Osama Bin Laden to an Arab television network.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts as if they have already been established. No employee from WAMY referred to in this request delivered any tape from Osama Bin Laden to an Arab Television network. Subject to and without waiving these objections, WAMY has no responsive documents.

Request No. 13

Please provide all documents relating to any investigation or inquiries conducted by the Republic of India concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing or otherwise supporting Islamic terror groups in the Kashmir region such as Students Islamic Movement of India ("SIMI"), Lashkar-e-Taibah, and Hizbul Mujahideen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, such as WAMY Saudi Arabia "supporting Islamic terror groups in the Kashmir region" and does not seek discovery with sufficient particularity Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation.

Request No. 14

Please provide all documents relating to the 2002 arrests of two men attempting to transfer money, given to them by WAMY official Nazir Qureshi, to Kashmiri terrorist groups.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The cited groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1488-1487, previously produced.

Request No. 15

Please provide all documents relating to any investigation or inquiries conducted by Romanian authorities concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, the alleged involvement of WAMY in an al Qaida plot to hijack a plane and crash it into London's Heathrow Airport.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. WAMY Saudi Arabia has no knowledge of this alleged plot. Subject to and without waiving these objections, Defendant has no responsive documents. If Plaintiffs allege such a claim, they should be in the best position to offer this evidence.

Request No. 16

Please provide all documents relating to any investigation or inquiries conducted by the Russian Federation concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing and otherwise supporting Islamic terrorists and separatists in Chechnya. Subject to and without waiving these objections, WAMY has no responsive documents.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, WAMY refers Plaintiffs to index number 152.

Request No. 17

Please provide all documents relating to any investigation or inquiries conducted by the Republic of the Philippines concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, accusations by the Philippines Government that WAMY was financing the Moro Islamic Liberation Front ("MILF") terrorist organization.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and erroneously assumes disputed facts and allegations as if established such as WAMY Saudi Arabia's "support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities." Defendant objects to Plaintiffs' request that it does not seek discovery with sufficient particularity. Defendant further objects on the ground that the referenced groups have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, WAMY has no responsive documents.

Request No. 18

Please provide all documents relating to any investigation or inquiries conducted by the Federal Republic of Germany concerning Ibrahim El Zayat (formerly the Western European Head of WAMY), including without limitation, any investigation regarding the transfer of money by El Zayat and Ayman Sayed Ahmed Aly on behalf of WAMY to the Albanian branch of Taibah International, an Islamic charity whose Bosnian branch was designated as a Specially Designated Global Terrorist Entity in 2004 by the United States and United Nations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is irrelevant, overbroad, unduly burdensome and erroneously assumes disputed facts and allegations as if established, such as WAMY Saudi Arabia transferring money to branch of Taibah International. The request does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 2026-2516 and index number 152.

Request No. 19

Please provide all documents relating to the 2002 raid of WAMY's offices in Virginia, conducted by U.S. authorities, including without limitation, copies of all documents and things which were seized by U.S. authorities between September 11, 2001 and the present.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, duplicative, and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's production of documents.

Request No. 20

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation.

Request No. 21

Please provide all documents WAMY sent to, and/or received from the person and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), including without limitation, all documents relating to the transfer of funds between WAMY and those persons and entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation.

Request No. 22

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes dispute facts and allegations as if established and does not seek discovery with sufficient particularity. None of the individuals in Attachment A have anything to do with the subject matter of this litigation. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 23

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons identified in Attachment B. For those persons who currently hold, or have held, positions within WAMY, responsive documents shall include, but are not limited to, their personnel files.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1354-1359 (previously produced), and 2026-2516.

Request No. 24

Please provide all documents WAMY sent to, and/or received from the persons identified in Attachment B, including without limitation, all documents relating to the transfer of funds between WAMY and those persons.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant will make responsive documents available for inspection at its offices in Riyadh, Saudi Arabia with costs to Plaintiffs. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1354-1359 (previously produced), and 2026-2516.

Request No. 25

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons identified in Attachment B, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity.

Request No. 26

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the entities identified in Attachment C.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation.

Request No. 27

Please provide all documents WAMY sent to, and/or received from the entities identified in Attachment C, including without limitation, all documents relating to the transfer of funds between WAMY and those entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation.

Request No. 28

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the entities identified in Attachment C, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if established. Plaintiffs' request is irrelevant insofar as the entities cited have nothing to do with the subject matter of this litigation.

Request No. 29

Please provide all documents relating to any investigation or inquiry conducted by any United States Investigator, Foreign Investigator, or any KSA Investigator, which references or

addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-2025, 2026-2516, and index number 152.

Request No. 30

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-2025, 2026-2516, and index number 152.

Request No. 31

Please provide all documents relating to any internal investigation or inquiry conducted by WAMY and/or WAMY Personnel which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include any investigation or inquiry ordered, conducted, supervised, overseen, or reviewed by the KSA and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-2025, 2026-2516, and index number 152.

Request No. 32

Please provide all documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-2025, 2026-2516, and index number 152.

Request No. 33

Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 34

Please provide all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or associated with WAMY, was associated with or involved in any military or terrorist activity, plot or attack, indicating an intention to direct conduct against or target conduct toward the United States of America.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the

definitions of “military activity, plot or attack.” Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 35

Please provide any and all documents relating to any sanctions imposed upon WAMY and/or WAMY Personnel by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 36

Please provide all documents relating to the struggle against the Soviet occupation of Afghanistan during the 1980s, including without limitation, WAMY's involvement.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 37

Please provide all documents relating to WAMY's role in providing material support or resources, directly or indirectly, to the mujihadeen forces in Afghanistan in their struggle against the Soviet occupation during the 1980s. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the

definition of “mujahideen forces.” Pursuant to Judge Daniels’ Order of December 21, 2007, the scope of discovery is limited to the period beginning in 1992.

Request No. 38

Please provide all documents relating to WAMY's role in providing material support or resources to the mujihadeen forces or other Islamic fighters in Afghanistan, Albania, Algeria, Bosnia, Chechnya, Egypt, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Somalia, Sudan, Tanzania, Turkey, Yemen, or elsewhere, including without limitation, the support of camps in and/or around those areas, recruitment, training, transportation, lodging, the acquisition, trafficking, and/or smuggling of weapons and arms such as rockets, mortars, rifles, dynamite and other bombs, and the provision of boots, tents, and uniforms.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs’ request is vague and ambiguous as to the definition of “mujahideen forces.” The conflicts, crises or conditions referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 2517-5170, and 5837-6288.

Request No. 39

Please provide all documents authored, published, or disseminated by WAMY relating to the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several “conflicts, crises or conditions” referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 2517-5170, 5837-6288, and index number 152.

Request No. 40

Please provide all documents relating to fundraising activities conducted by WAMY in relation to relief or humanitarian efforts, or other operations, in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1219-1230 (previously produced), 2517-5170, 5837-6288, and index number 152.

Request No. 41

Please provide all interviews, statements, or speeches by WAMY Personnel regarding the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The request is irrelevant as several “conflicts, crises or conditions” referred to have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1219-1230 (previously produced), 2517-5170, 5837-6288, and index number 152.

Request No. 42

Please provide all documents authored, published, or disseminated by WAMY discussing the legitimacy of any armed jihad or resistance by Muslims in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant insofar as many of the named conflicts, crises and conditions have nothing to do with the subject matter of this litigation. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1219-1230 (previously produced), 2517-5170, 5837-6288, and index number 152.

Request No. 43

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to mujahideen forces in any part of the World. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome and erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of "mujahideen forces." Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 44

Please provide all documents authored, published, or disseminated by WAMY discussing the provision of support to any armed jihad in any part of the World, regardless of whether such jihad was declared legitimate by competent religious authorities. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. The request is vague and ambiguous as to the definition of "financial, medical, logistical, administrative, religious and political assistance." Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 45

Please provide all interviews, statements, or speeches by WAMY Personnel which mention "jihad" (*see* Definition No. 18), regardless of whether you believe such individual(s) was or was not acting within the scope of his employment at WAMY in relation to such activity.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs' overbroad definition of *jihad*.

Request No. 46

Please provide all documents authored, published, or disseminated by WAMY which mention "jihad" (*see* Definition No. 18), including without limitation: *Islamic Views; Islamic Camps: Objectives, Program Outlines, Preparatory Steps; Military Lessons in the Jihad Against the Tyrants; A Handy Encyclopedia Of Contemporary Religions & Sects*; and *Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established such as the publication of *Military Lessons in the Jihad Against the Tyrants*. Defendant objects to Plaintiffs' overbroad definition of *jihad*. Subject to and without waiving these objections, Defendant refers Plaintiffs to its full publications in index 155.

Request No. 47

Please provide all WAMY documents mentioning "jihad" (*see* Definition No. 18), which can be generated via an electronic search of WAMY's computers or electronic data storage systems.

ANSWER:

Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant objects to Plaintiffs' overbroad definition of *jihad*.

Request No. 48

Please provide a list of all publications, newspapers, newsletters, books, reports, pamphlets, videotapes, audiotapes, and/or websites published, authored, and/or financed in whole or in part, by the WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-2025, 5837-6288, and index number 152 and 155.

Request No. 49

Please provide all documents illustrating, describing or otherwise relating to WAMY's formation and organizational structure, the date of incorporation, the state of incorporation, the duration of WAMY's existence, any documents relating to WAMY's initial capitalization and subsequent funding, and/or any other writing relating to the creation or purpose of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-6537, and index number 153.

Request No. 50

Please provide all documents relating to the administration, governance, and long-term strategic decision-making of WAMY (including any subsidiary, affiliate, or branch office), including without limitation, articles of incorporation, by-laws, corporate charters, mission statements, constitutions, documents relating to the duties and powers of any boards and/or committees, statements of purpose, and/or any other related writing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity to WAMY Saudi Arabia. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1597-1633 (previously produced), and 1902-6537 and index number 153.

Request No. 51

Please provide all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of WAMY, including without limitation, the Kashmir Muslim Youth Committee and the Camps and Conference Committee.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1231-1251, 1524-1596 (previously produced), 1902-6537, and index number 153.

Request No. 52

Please provide all documents identifying each officer, director, trustee, board member, and/or committee member of WAMY (including any subsidiary, affiliate, or branch office).

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1231-1251, 1524-1596 (previously produced) and index number 153.

Request No. 53

Please provide all documents relating to any meetings of officers, directors, trustees, managers, boards, committees, and/or internal bodies of WAMY, including without limitation, any agendas or meeting minutes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1231-1251 (previously produced) and index 153.

Request No. 54

Please provide all financial statements, balance sheets, income statements, and annual reports for WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY refers Plaintiffs to WAMY International's document production. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1664-1681 (previously produced), and index number 154.

Request No. 55

Please provide all documents relating to any audit, analysis, examination, survey, or review of WAMY's bank accounts, investments, assets, capital, and/or financial affairs, conducted either by employees of WAMY or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-2025.

Request No. 56

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents identifying projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1262-1353, 1370-1386, 1494-1523, 1642-1663 (previously produced), and 1902-6537.

Request No. 57

From the period beginning January 1, 1990 through September 11, 2001, please provide all documents summarizing the funds allocated by WAMY to projects undertaken or financed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Pursuant to Judge Daniels' Order of December 21, 2007, the scope of discovery is limited to a period beginning in 1992. The scope of this request is too broad and not limited by subject matter. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1262-1353, 1370-1380, 1494-1523, 1642-1663 (previously produce), and 1902-6537.

Request No. 58

Please provide all documents relating to any fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY. Such documents shall include, but are not limited to, advertisements, promotional materials, invitations to the event, press releases issued in connection with the event, lists of sponsors and attendees, documents identifying the purpose of the fundraiser or conference, materials distributed at the event, written receipts and/or records of the monies collected, written receipts and/or records of how those monies were used and/or distributed, lists of donors, lists of speakers, videos or slides shown at the event, and transcripts, broadcasts, audiotape and/or videotapes of the event.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1262-1353, 1370-1380, 1494-1523, 1642-1663 (previously produced), and 1902-6537.

Request No. 59

Please provide all documents relating to the relationship between WAMY's Saudi headquarters and WAMY's branch offices worldwide, including but not limited to the WAMY offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include,

but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY further objects to the extent it does not have custody or control over its branch offices worldwide. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1387-1487, 1634-1641, 1745-1901 (previously produced), 1902-6537, and index number 152, 153, and 154.

Request No. 60

Please provide all documents relating to the role of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in the fundraising efforts of WAMY's offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 61

Please provide all documents relating to the relationships between and among WAMY's branch offices worldwide, including but not limited to the WAMY's offices in the United States, Afghanistan, Australia, Austria, Argentina, Bangladesh, Brazil, Canada, Comoro Islands, Congo, Iraq, Italy, Indonesia, France, Jordan, Kenya, Malaysia, Pakistan, New Zealand, Nigeria, Philippines, United Kingdom, Russia, Saudi Arabia, Senegal, Somalia, Sudan, Syria, Tanzania, Thailand, and Uganda. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY further objects to the extent it does not have custody or control over its branch offices worldwide. Subject to and without waiving these

objections, WAMY refers Plaintiffs to WAMY SA 1745-1901 (previously produced), 1902-6537, and index number 152, 153, and 154.

Request No. 62

Please provide all directives, instructions, and/or communications sent by any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of any WAMY office worldwide to the WAMY offices in the United States.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter. WAMY further objects to the extent it does not have custody or control over its branch offices worldwide. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-6537 and index number 153.

Request No. 63

Please provide all annual, semi-annual and periodic reports submitted by the WAMY branch offices to WAMY headquarters in Saudi Arabia concerning their finances and operations, including without limitation, annual reports, balance sheets, financial statements, bank account summaries, and audits.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. WAMY further objects to the extent it does not have custody or control over its branch offices worldwide. Subject to and without waiving these objections, WAMY refer Plaintiffs to WAMY SA 1664-1681 (previously produced) and index number 152, 153, and 154.

Request No. 64

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted and followed by WAMY by which charitable contributions are either made to and/or raised by You, how those contributions are collected and accounted for, how it is determined to which charitable designees financial or other forms of support should be distributed, the means by which financial or other forms of support are subsequently disbursed to charitable designees, and the means to ensure that such distributions are being used for charitable purposes.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, duplicative not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 65

Please provide all documents relating to the involvement of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in determining how funds collected by WAMY's branch offices outside of Saudi Arabia should be allocated and/or in the distribution of funds collected by the offices outside of Saudi Arabia.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity.

Request No. 66

Please provide all documents relating to any written or oral communications between WAMY and the KSA and/or SAMA regarding anti-terrorism policies, practices or procedures. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague and does not seek discovery with sufficient particularity.

Request No. 67

Please provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted by WAMY concerning the acceptance and distribution of monetary donations, which were implemented and used, or are currently being used, to prevent or deter financial crimes such as money laundering or the facilitation of terrorism financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, duplicative and does not seek discovery with sufficient particularity.

Request No. 68

Please provide all documents in relating in any way to WAMY meetings, correspondence, statements, or other communications concerning terrorist financing.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY does not have responsive documents.

Request No. 69

Please provide all summaries of contributions received and/or disbursements made by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and vague. In addition the request asks the Defendant to prepare a summary for Plaintiffs which is extremely burdensome. The request does not seek discovery with sufficient particularity. Plaintiffs' request is not limited in scope to the subject matter of this litigation. Subject to and without waiving its objections, WAMY refers Plaintiffs to WAMY SA 1252-1261, 1365-1369, 1403-1415 (previously produced).

Request No. 70

Please provide all information contained in any database maintained by you, identifying or relating to the sources of funds contributed to WAMY, and/or the destination of funds distributed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter.

Request No. 71

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Kingdom of Saudi Arabia, including without limitation,

the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (a/Ida the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 72

Please provide all documents WAMY sent to and/or received from the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (aAda the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 73

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies, or papers.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 74

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's role in advancing the foreign policy objectives of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 75

Please provide all documents relating to all accounts in any United States, Saudi Arabian, or foreign banking or financial institution You currently hold, or have held, jointly with the KSA, any members of the Saudi royal family, or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You currently hold or have held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 76

Please provide all documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of WAMY, including any subsidiary, affiliate, and/or branch office.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 77

Please provide all documents relating to WAMY's initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 78

Please provide all documents defining, establishing, or relating to WAMY's privileges, obligations, activities, and/or rights under the laws of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and limited to the subject matter of this litigation.

Request No. 79

Please provide all documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to WAMY, including but not limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over WAMY's operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome vague, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 80

Please provide all documents relating to any fundraising events and/or conferences that were held for the benefit of WAMY and were promoted, sponsored, organized, funded, managed, attended, or supervised by the KSA, any member of the Saudi family, and/or any Saudi official acting on behalf of the KSA. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 81

Please provide all documents relating to any meeting between officers or representatives of WAMY and any official or agency of the KSA.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. The scope of this request is too broad and not limited by subject matter. Plaintiffs' request is irrelevant and immaterial to the subject matter of this litigation.

Request No. 82

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and each of the Charities identified in Attachment D. In the event that WAMY, including any subsidiary, affiliate, and/or branch office shared office space with any of the Charities identified in Attachment D, please provide such documents.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, vague, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1682-1744 (previously produced), and 1902-2025.

Request No. 83

Please provide all documents WAMY sent to, and/or received from the Charities identified in Attachment D, including without limitation, all documents relating to the transfer of funds between WAMY and those Charities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-2025.

Request No. 84

Please provide all documents relating to any joint fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY and any of the Charities identified in Attachment D. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 85

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the Charities identified in Attachment D, and/or any accounts over which WAMY currently holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, irrelevant, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 86

Please provide all documents relating to all information or notification WAMY received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 87

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 88

Please provide all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 89

Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents

Request No. 90

Provide copies of any and all laws, statutes, regulations, ordinances, or royal decrees which would have prohibited any Islamic charity or benevolent association from: (i) engaging in conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) providing material support or resources to al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, and harassing. The documents requested are available to Plaintiffs from other public sources.

Request No. 91

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Benevolence International Foundation ("BIF"), including

but not limited to, documents relating to shared office space or common employees of WAMY and BIF, including the branch offices of WAMY and BIF.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Defendant is not in custody or control of documents in the possession of other WAMY subsidiaries, affiliates or branch offices. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1682-1744 (previously produced).

Request No. 92

Please provide all documents governing, describing, detailing, or otherwise relating to WAMY's and BIF's joint publication and distribution of the book titled *Al Ansar al Arab fi Afghanistan* ("The Arab Volunteers in Afghanistan").

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is unduly burdensome, vague, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and erroneously assumes disputed facts and allegations as if they have already been established. The request does not specify the period or offer a time frame. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 93

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 94

Please provide all documents relating to all information or notification You received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with WAMY may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 95

Please provide all documents you sent to, and/or received from any third party relating to the alleged involvement of WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 96

Please provide all documents You sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that WAMY, WAMY Personnel, or any other individual or entity employed by and/or affiliated with WAMY, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definitions of "extremist activity" and "radical." Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 97

Please provide all documents relating to any internal investigations conducted by WAMY and/or WAMY Personnel into any alleged criminal, corrupt, or extremist activities of any individual or entity employed by and/or affiliated with WAMY, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Request No. 98

Please provide all documents relating to any action taken by WAMY and/or WAMY Personnel to prevent criminal activities, including the sponsorship of terrorists or radicals, by any individual or entity employed by and/or affiliated with WAMY or any of its branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as. Plaintiffs' request is vague and ambiguous as to the definition of "radicals."

Request No. 99

Please provide all documents relating to any action undertaken by WAMY and/or WAMY Personnel to remove or purge radical or corrupt elements or individuals from WAMY's branch offices.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously

assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Plaintiffs' request is vague and ambiguous as to the definition of "radicals." Without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1682-1744 (previously produced), and 1902-6537.

Request No. 100

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY subsidiary, affiliate, branch office, officer, director, trustee, board member, committee member, manager, agent, employee, volunteer, and/or representative as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, vague, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity.

Request No. 101

Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any WAMY supporter, donor, supplier, contributor, facilitator, speakers, foreign government supporters, business supporters, or banks as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Request No. 102

Please provide all documents relating to any individual currently detained or incarcerated in Cuba, Afghanistan, or elsewhere in connection with the global war on terrorism, including without limitation, all documents relating to any meetings, interviews, or dialogue WAMY and/or WAMY Personnel have had with individuals held at Guantanamo Bay.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-2025.

Request No. 103

Please provide all documents relating to any WAMY Personnel who have been arrested, detained, or incarcerated in connection with the global war on terrorism, including without limitation, any and all employment records for such individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to WAMY SA 1902-2025.

Request No. 104

Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, any and all documents relating to any positions such individuals currently hold, or have held, within WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity.

Request No. 105

Please provide any and all documents WAMY sent to, and/or received from any Saar Network-Related Entity and/or any Saar Network-Related Individual, including without limitation, all documents relating to the transfer of funds between WAMY and such entities and/or individuals.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity

Request No. 106

Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of any Saar Network-Related Entity and/or any Saar Network-Related Individual, and/or any accounts over which WAMY holds or has held signatory authority.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant contends that Plaintiffs created the Saar Network theory which the Court ultimately dismissed. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome, erroneously assumes disputed facts and allegations as if they have already been established and does not seek discovery with sufficient particularity. Subject to and without waiting these objections, Defendant has no responsive documents.

Request No. 107

Please provide all documents relating to any formal or informal record keeping and document retention policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome duplicative and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to index number 153.

Request No. 108

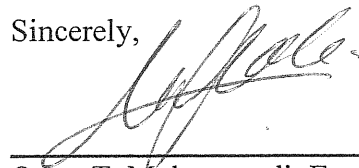
Please provide all documents relating to any formal or informal document destruction policies, practices, or procedures maintained by WAMY, any WAMY branch, or any WAMY subsidiary or affiliate, including without limitation, descriptions of all documents destroyed by WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, unduly burdensome and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, Defendant has no responsive documents.

Dated: August 30, 2012

Sincerely,



Omar T. Mohammedi, Esq.
Law Firm of Omar T. Mohammedi, LLC
Woolworth Building
233 Broadway, Suite 801
New York, NY 10279

/s/ Frederick Goetz
Frederick Goetz, Esq.
Goetz & Eckland P.A.
Exposition Hall at Riverplace
43 Main Street S.E., Suite 505
Minneapolis, Minnesota 55414
612-874-1552
612-331-2473 (fax)
www.goetzecklandlaw.com

*Attorneys for World Assembly of Muslim Youth Saudi
Arabia and World Assembly of Muslim Youth International*

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of August 2012, I caused an electronic copy of Defendants World Assembly of Muslim Youth Saudi Arabia's Supplemental Responses to Plaintiffs' Requests for Production of Documents to be produced on a DVD and served by Federal Express upon:

Sean Carter
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103
(SCarter1@cozen.com)
For the Plaintiffs' Executive Committees


Heela Masood

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST
ATTACKS ON
SEPTEMBER 11, 2001

03-MD-1570 (GBD)(FM)
ECF Case

This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977
Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738
Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970
Federal Insurance Col, et al. v. Al Qaida, et al., No. 03-CV-6978
Euro Brokers v. Al Baraka Investment and Development Corp., et al., No. 04-CV-7279
Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al.,
No. 04-CV-1923
World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., No. 04-CV-07280

**DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA'S
SUPPLEMENTAL RESPONSES TO PLAINTIFFS' REQUEST FOR PRODUCTION OF
DOCUMENTS**

Defendant World Assembly of Muslim Youth Saudi Arabia ("WAMY Saudi Arabia"), through undersigned counsel, hereby responds to Plaintiffs' Request for Production of Documents.

GENERAL OBJECTIONS

1. Defendant WAMY Saudi Arabia objects to plaintiffs' "Definitions" and Document Requests insofar as they:
 - a. Request information or identification of documents concerning confidential communications between defendant and its attorneys, on the grounds that the information sought is protected under the attorney/client privilege;
 - b. Request information or identification of documents prepared by Defendant's counsel for their own use, or prepared by Defendant or Defendant's witnesses

for use by Defendant's counsel, on the grounds that the information sought is protected from disclosure by the attorney work-product doctrine;

- c. Seek to enlarge Defendant's obligation to respond to discovery beyond the obligations established by the Federal Rules of Civil Procedure and the Local Rules of this Court;
- d. Seek information or documents to which plaintiffs have an equal or greater access than Defendant.
- e. Seek information or documents prior to the year 1992 pursuant to Judge Daniel's Order of December 21, 2007 (Docket No. 2059) limiting discovery relating back to the period beginning in 1992.

2. Defendant has made a diligent and reasonable search and inquiry for the information requested by the requests. Any response contained herein, however, is given with the understanding that WAMY Saudi Arabia and its attorneys are still conducting discovery and investigation in connection with this action. Defendant's responses are therefore without waiver of, or prejudice to, its right to later use additional information not set forth or referred to in this response. In addition, any response contained herein is made with the express reservation of all rights pursuant to the Federal Rules of Civil Procedure and Local Civil Rules of this Court to supplement or amend these responses or to present evidence either discovered subsequent to the date hereof, or the significance of which is later discovered.
3. In its specific responses below, Defendant's statement that responsive documents will be made available for inspection does not mean that any documents exist.

4. Any documents produced herein designated as "Confidential" shall be subject to Judge Casey's Order of Protection of October 3, 2006.
5. The above-stated General Objections are hereby incorporated in each of WAMY Saudi Arabia's following responses to specific requests, whether or not expressly repeated in response to a particular request.

DOCUMENT REQUESTS

Request No. 48


Please provide a list of all publications, newspapers, newsletters, books, reports, pamphlets, videotapes, audiotapes, and/or websites published, authored, and/or financed in whole or in part, by the WAMY.

ANSWER:

Defendant WAMY Saudi Arabia incorporates its general objections. Defendant further objects to this request on the grounds that it is overbroad, irrelevant, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence and does not seek discovery with sufficient particularity. Subject to and without waiving these objections, WAMY refers Plaintiffs to the supplemental index number 156.

Dated: December 15, 2014

Sincerely,



Omar T. Mohammedi, Esq.
Law Firm of Omar T. Mohammedi, LLC
Woolworth Building
233 Broadway, Suite 801
New York, NY 10279

/s/ Frederick Goetz
Frederick Goetz, Esq.
Goetz & Eckland P.A.
Exposition Hall at Riverplace
43 Main Street S.E., Suite 505
Minneapolis, Minnesota 55414
612-874-1552

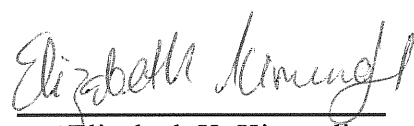
612-331-2473 (fax)
www.goetzecklandlaw.com

*Attorneys for World Assembly of Muslim Youth Saudi
Arabia and World Assembly of Muslim Youth International*

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of December 2014, I caused an electronic copy of Defendants World Assembly of Muslim Youth Saudi Arabia's Supplemental Responses to Plaintiffs' Requests for Production of Documents to be produced on a DVD and served by Federal Express upon:

Sean Carter
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103
(SCarter1@cozen.com)
For the Plaintiffs' Executive Committees


Elizabeth K. Kimundi

WAMY PUBLICATIONS INDEX OF

ائمة بالكتب التي طبعتها الندوة العالمية للشباب الإسلامي

Responsive to DR 48

المؤلف	الكتاب
الندوة العالمية للشباب الاسلامي	مجلة المســـــــــقبل
World Assembly of Muslim Youth	What they say about Islam – WAMY Series on Islam no.3
World Assembly of Muslim Youth	What they say about Mohammed - - WAMY Series on Islam no.4
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